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3 Santa Monica, CA 90403
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5 Email: 2@lucasmurrey.io
6 Website: lucasmurrey.com
7 SocialMedia: sickoscoop.com/lucas

8 Plaintiff & Plaintiff In Pro Per
9

10 **SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES**

11 **STANLEY MOSK COURTHOUSE**

12 Dr. Stewart Lucas Murrey, an individual;) Case No. 23STCV14890
13 Plaintiff,)
14 Vs.) **DECLARATION OF PLAINTIFF DR.**
15 Kelly Gibbons a.k.a. Kel Culb Gib, an) **MURREY IN SUPPORT OF PLAINTIFF**
16 individual; Liv Burger, an individual; Elly) **DR. MURREY'S OPPOSITION TO**
17 Shariat, an individual; Ainka Wiz, an individual;) **DEFENDANT KELLY GIBBONS'ANTI-**
18 Anonymous Group Member 1, an individual;) **SLAPP MOTION TO STRIKE**
19 Amy Blalock, an individual; Vanessa Valdes, an) Date: 1 July 2024
20 individual; Lena Vanderford, an individual;) Time: 10:00 a.m.
21 Michal Ofek, an individual; Kelyn Rodriguez, an) Dept.: 61
22 individual; and DOES 1 through 50, inclusive;) Complaint Filed: 27 June 2023
23 Defendants) Hon. Lynne M. Hobbs
24 _____
25
26
27
28

I, Dr. Stewart Lucas Murrey, declare as follows:

1. That I am the plaintiff in this action; that I am over the age of 18 years and that I have
personal knowledge of the facts contained in this declaration. If called upon to testify I could
and would testify competently as to the truth of the facts stated herein.

- 1 2. I received my Doctorate of Philosophy (Ph.D) from Yale University in 2011, I have since
2 published various books and articles on the origins of money and tragedy; I am presently
3 working on new material while I continue to join my voice to peaceful protests supporting
4 civil rights for all peoples everywhere. Based upon these achievements I use the title doctor in
5 front of my name.
- 6
- 7 3. This declaration is submitted in support of plaintiff's opposition to defendant Kelly Gibbons'
8 anti-SLAPP motion to strike his complaint or, in the alternative, request for leave to amend
9 complaint based on evidence submitted in opposition.
- 10 4. I have a Ph.D from Yale University and my scholarly books have received praise from Noam
11 Chomsky, Richard Seaford, Bernard Böschenstein as well as from the chairs of departments
12 of philosophy and classics from the universities of the Sorbonne and Basel, respectively, and
13 they are available at every serious library.
- 14
- 15 5. A true and correct copy of a few of books and said praise is hereto attached as Exhibit A.
- 16 6. Seeking merely to socialize following COVID19 I matched with Gibbons on Tinder in
17 January of 2022, but I soon realized that Gibbons was "cat-fishing" me and I rejected her and
18 then moved on with my life peacefully.
- 19
- 20 7. A true and correct copy of an excerpt of said intermittent texts, my rejection of Gibbons for
21 rightly suspecting that she is a "catfish", pictures of Gibbons and "catfishing" are hereto
22 attached as Exhibit B.
- 23
- 24 8. Instead of going her separate way, Gibbons scornfully doxed me online, starting multiple
25 discussions on various forums to defame and cyberbully me for years.
- 26
- 27 9. A true and correct copy of Gibbons scornful obsession with me and harming me is hereto
28 attached as Exhibit C.

10. Gibbons accuses plaintiff of having “pressed lawsuits against a number of women to extort money from them and was suspected in the murder of his ex[-]wife”.
11. A true and correct copy of Gibbons’ defamatory statements is hereto attached as Exhibit D.
12. All of these statements are false. I have never extorted anyone, much less committed any other serious crime like murder. Presumably Gibbons is savagely referring to my girlfriend who passed from cancer in 2018 and for whom I deeply cared and loved. I have never been married. I have also never been charged, much less convicted of any crime my entire life. And as anyone who can read knows, every lawsuit I have brought has been in good faith and based on real evidence. This is why I have never been judged as to having litigated any case in bad faith ever.
13. Gibbons repeats her statements that plaintiff has brought “extortion lawsuits”; is under “murder suspicion” – presumably for murdering his girlfriend who passed from cancer in 2018 –; is guilty of “fraudulent behavior”, “using a false identity”, “posing a significant risk of attempting to obtain money from other users through deceitful means”, “suing a company that catches cheaters and the suspicion of murdering his wife?! Dateline vibes” – just as defendant Blalcock, whose anti-SLAPP failed in regard to libel, libel per se and false light, stated –, is “obviously a predator”, whose Ph.D from Yale University is fraudulent; but who stalked Elly Shariat whose fictional story is somehow true; as well as a slew of other defamatory statements e.g. plaintiff is a “narcissist”, “full-blown sociopath” etc.
14. A true and correct copy of Gibbons’ above-noted defamatory and harmful statements is hereto attached as Exhibit E.
15. All of these statements are false.

- 1 16. Weaponizing the above-noted false allegations of murder, extortion, fraud, theft, identity
2 theft, stalking, etc. Gibbons' Facebook conspiracy with defendants Blalock et al. to defame
3 and harm me spun out of control.
- 4 17. A true and correct copy of evidence of Gibbons' Facebook conspiracy to harm me is hereto
5 attached as Exhibit F.
- 6 18. Gibbons would come up with anything with which to falsely accuse me and generate fear-
7 porn. For instance, Gibbons falsely stated "he unmatches people to make it harder to report
8 him" when this is false on its face. One does not have to be matched with anyone to report a
9 person on a dating app. I have been successful on dating apps and I frequently unmatched
10 people as is my right. I did not commit any crimes on the apps and therefore, I had no reason
11 to worry about being reported.
- 12 19. A true and correct copy of Gibbons' false statement that I unmatched people for nefarious
13 reasons and a screenshot of how anyone can report anyone else is hereto attached as Exhibit
14 G.
- 15 20. Gibbons is a fanatical cyberbully who hides behind distorted angles and heavily
16 photoshopped images of herself to lurk on Facebook forums such as "Are We Dating the
17 Same Guy" ("AWDSG") to attack countless individuals, even including one man who is
18 deceased and not able to hurt anyone. Seemingly jaded, Gibbon's misrepresentation of herself
19 stems from projecting her own insecurities and vindictiveness on others. There is nothing
20 more dangerous than an insecure person with a weapon that puts his/her ego first and these
21 unmonitored forums enable self-serving cowards to do irreversible harm to others. For over a
22 year, Gibbons who has psychological disorders and weight issues made approximately 100
23 posts about plaintiff while stalking him, many of which she made while drunk: Gibbons
24
25
26
27
28

1 whose residential dwelling looks suspiciously like a trashy CIA or Israeli Mossad safe-house
2 embedded in an urban center enjoys expensive surveillance for an unsuccessful musician with
3 a fee waiver, is suspiciously outraged at plaintiff's t-shirt "CIA Approved News".
4

5 21. A true and correct copy of Gibbons harming men who have passed, admitting to her own
6 psychological disorders and weight issues, being drunk while on Facebook harming people,
7 including plaintiff, and her suspiciously surveilled Crenshaw Blvd. residence with convenient
8 access to the 10 Freeway is hereto attached as Exhibit H.

9 22. And finally, Gibbons and the other current defendants and like Valdes and Burger who are
10 going to be sued for unjust enrichment, negligence, gross negligence, etc. and thus brought
11 back into this lawsuit, has been stupid enough to post Shariat's fictional story on her
12 GoFundMe webpage which Gibbons et al. have been dumb enough to promote on
13 international news media and incite death threats and for which Gibbons, Valdes, Shariat and
14 others are currently facing restraining orders.
15

16 //
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27

23. A true and correct copy of said world-wide media smear campaign promoting said GoFundMe webpage with Shariat's defamatory story about plaintiff and Gibbons incitation of death threats and restraining oder petition is hereto attached as Exhibit I.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 17 June 2024 at Los Angeles, California.

/s/ Stewart Lucas Murrey
Dr. Stewart Lucas Murrey, Declarant
Plaintiff & Plaintiff in Pro Per
1217 Wilshire Blvd. # 3655
Santa Monica, CA 90403
Tel.: (424) 278-3017
Email: 2@lucasmurrey.io
Website: lucasmurrey.com
SocialMedia: sickoscoop.com/lucas

EXHIBIT A

Lucas Murrey

Hölderlin's Dionysiac Poetry

The Terrifying-Exciting Mysteries

This book casts new light on the work of the German poet Friedrich Hölderlin (1770 – 1843), and his translations of Greek tragedy. It shows Hölderlin's poetry is unique within Western literature (and art) as it retrieves the socio-politics of a Dionysiac space-time and language to challenge the estrangement of humans from nature and one other.

In this book, author Lucas Murrey presents a new picture of ancient Greece, noting that money emerged and rapidly developed there in the sixth century B.C. This act of monetization brought with it a concept of tragedy: money-tyrants struggling against the forces of earth and community who succumb to individual isolation, blindness and death. As Murrey points out, Hölderlin (unconsciously) retrieves the battle between money, nature and community and creatively applies its lessons to our time.

But Hölderlin's poetry not only adapts tragedy to question the unlimited "machine process" of a clever race of money-tyrants. It also draws attention to Greece's warnings about the mortal danger of the eyes in myth, cult and theatre. This monograph thus introduces an urgently needed vision not only of Hölderlin hymns, but also the relevance of disciplines as diverse as Literary Studies, Philosophy, Psychology (Psychoanalysis) as well as Religious and Visual (Media) Studies to our present predicament, where a dangerous visual culture, through its support of the unlimitedness of money, is harming our relation to nature and one another.

"Here triumphs a temperament guided by ancient religion and that excavates, in Hölderlin's translations, the central god Dionysus of Greek tragedy." — Bernhard Böschenstein, author of "Frucht des Gewitters". Zu Hölderlins Dionysos als Gott der Revolution und Paul Celan: Der Meridian. Endfassung — Entwürfe — Materialien.

"Lucas Murrey shares with his subject, Hölderlin, a vision of the Greeks as bringing something vitally important into our poor world, a vision of which few classical scholars are now capable." — Richard Seaford, author of *Money and the Early Greek Mind. Homer, Tragedy, Philosophy and Dionysus*.

"Hölderlin deserved such a book." — Jean-François Kervégan, author of *Que faire de Carl Schmitt?*

"...fascinating material..." — Noam Chomsky, author of *Media Control: The Spectacular Achievements of Propaganda* and *Nuclear War and Environmental Catastrophe*.

Philosophy

ISBN 978-3-319-10204-7



► springer.com

Murrey

Lucas Murrey



Hölderlin's Dionysiac Poetry

Hölderlin's Dionysiac Poetry

The Terrifying-Exciting Mysteries

 Springer

LITERARY STUDIES | PHILOSOPHY

"Once again, fascinating material. It is exciting to see the meaning of Orwell's unpublished preface 'The Freedom of the Press' enter into the orbit of German philosophy." —Noam Chomsky, Massachusetts Institute of Technology; author of *Manufacturing Consent: The Political Economy of the Mass Media and Gaza in Crisis: Reflections of Israel's War against the Palestinians*

"Lucas Murrey has produced a visionary adaptation of the Nietzschean Dionysiac to illuminate the dysfunctionality of twenty-first-century capitalism." —Richard Seaford, University of Exeter; author of *Money and the Early Greek Mind and Dionysus*

"As a new contemporary interpreter of Nietzsche, Lucas Murrey offers a critical analysis of the catastrophes that this German philosopher prophesized. In particular, Murrey's historical placement of Nietzsche that, on the one hand, looks explicitly backward to the poetry of Friedrich Hölderlin and, on the other hand, implicitly forward to the poetry of Stefan George, opens new doors of thought." —Bernhard Böschenstein, Université de Genève author of *Frucht des Gewitters: Zu Hölderlins Dionysos als Gott der Revolution und Paul Celan: Der Meridian*

"A congenial and rigorous new landmark study regarding Nietzsche's understanding of Dionysus in Greek tragedy during his Basel year. Well-versed in classical scholarship and challenging in its original insights into ancient and modern visual culture." —Anton Bierl, University of Basel; author of *Dionysos und die griechische Tragödie*

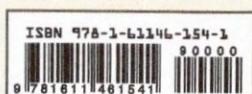
Lucas Murrey is from southern California and received his PhD in German studies and philosophy from Yale University in 2011. Since then he has been teaching seminars and giving public lectures, mostly in western Europe, at various universities and colleges.

Cover image: People dancing around bonfire at Yi International Torch Festival, by Michael Coyne

Author photo: Horst Lüdeking

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Murrey

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the meaning of earth

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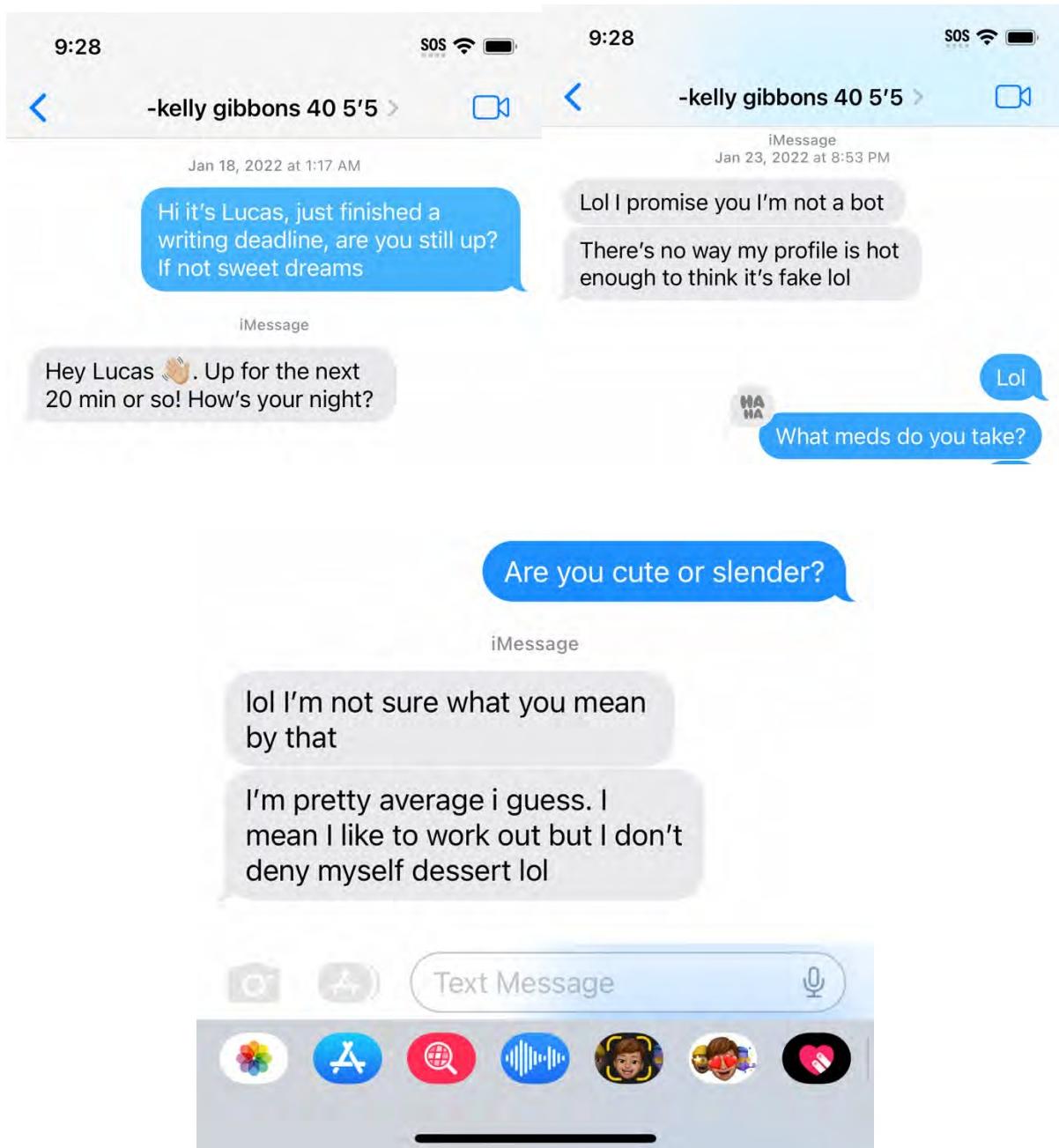
the meaning of earth

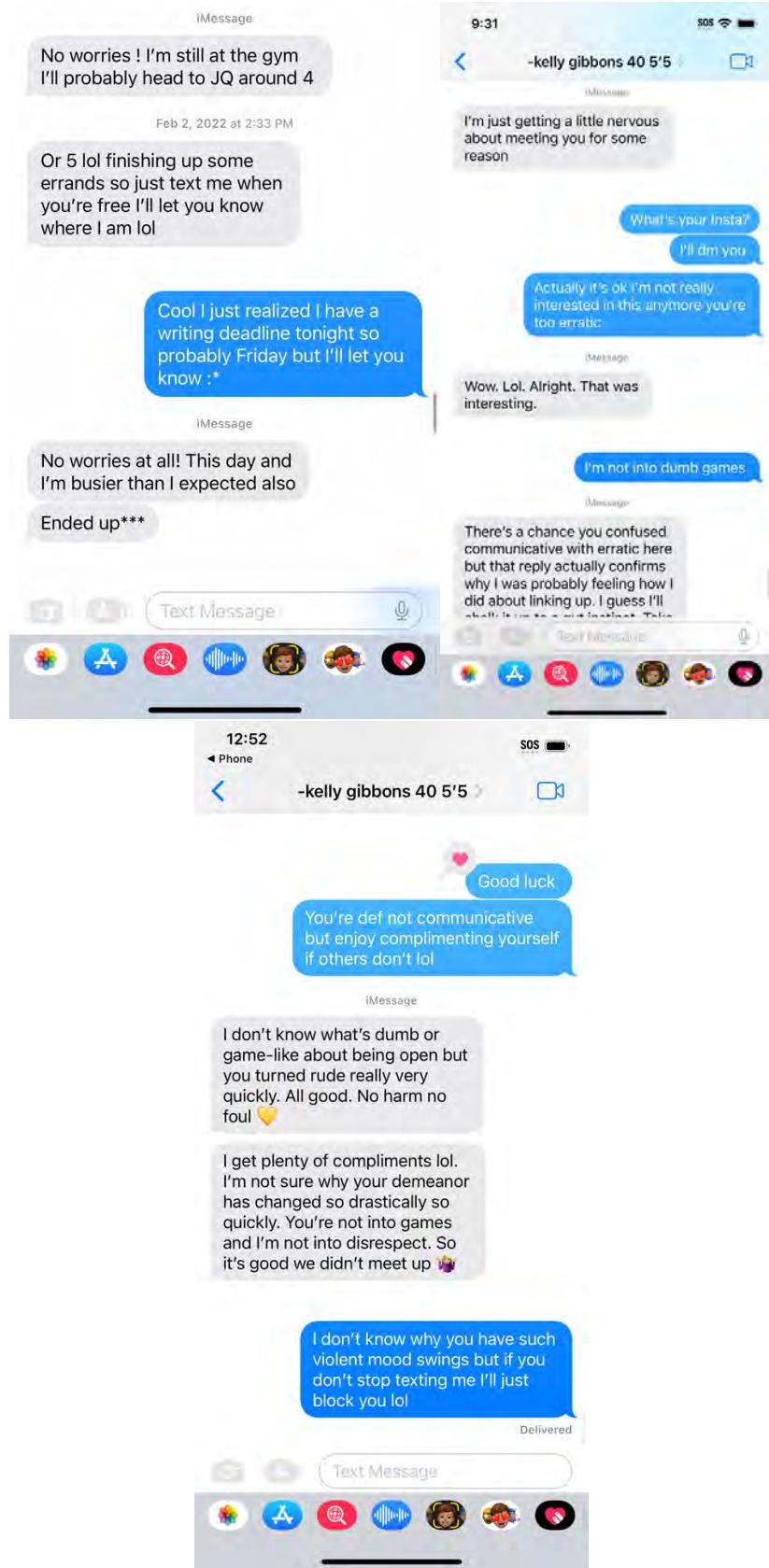
Lucas Murrey

EXHIBIT B

EXHIBIT B

Exh. B: Less than two (2) weeks of intermittent text exchanges between plaintiff Dr. Murrey and Gibbons in January 2022. This is the only time they have ever interacted with one another directly. Plaintiff has never met Gibbons in person. Soon after plaintiff rejected Gibbons for being a “catfish” i.e. using highly edited and filtered pictures of herself to trick men into dating her, plaintiff swiftly rejected Gibbons in early 2022 and moved on peacefully with his life. Oppositely Gibbons launched her sick obsession with plaintiff and with harming him online, including in secret Facebook forums, immediately after plaintiff rejected her.





Lucas Murray



Kelly Gibbons



I'm not sure why your demeanor has changed so drastically so quickly. You're not into games and I'm not into disrespect. So it's good we didn't meet up

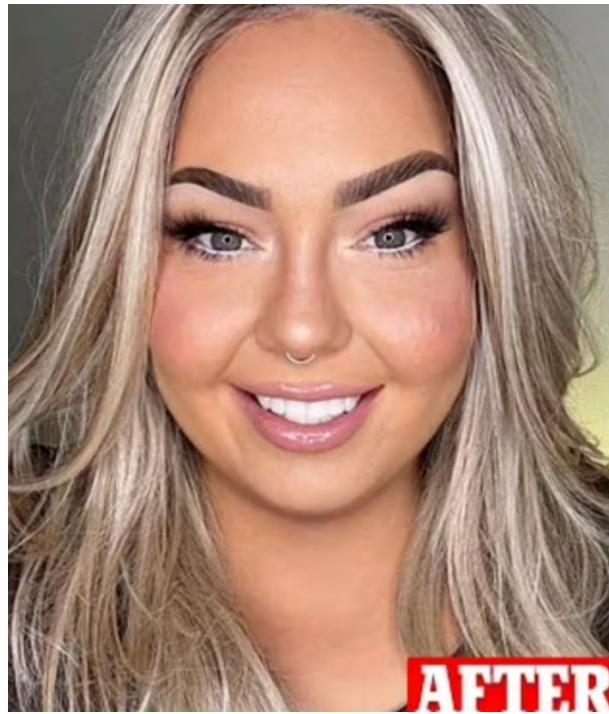
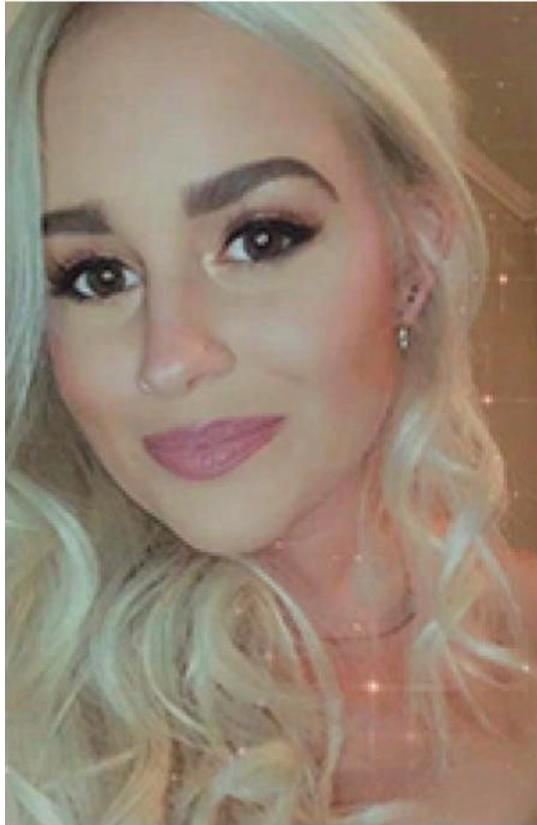


Delivered

I don't know why you have such violent mood swings but if you don't stop texting me I'll just block you lol

Feel free. This is the one of the strangest interactions I've ever had. You went full Jekyll/Hyde within like one minute after making plans. Lol

Sent as Text Message



AFTER BEFORE



EXHIBIT C



Kel Culb Gib

August 3, 2022 ·

...

▶▶▶ Tea in comments if approved- but I'm curious if anyone has met "Lucas" in person
(I'm not sure if that's even his real name)▶▶▶



41

Like

Comment

Send

307 comments

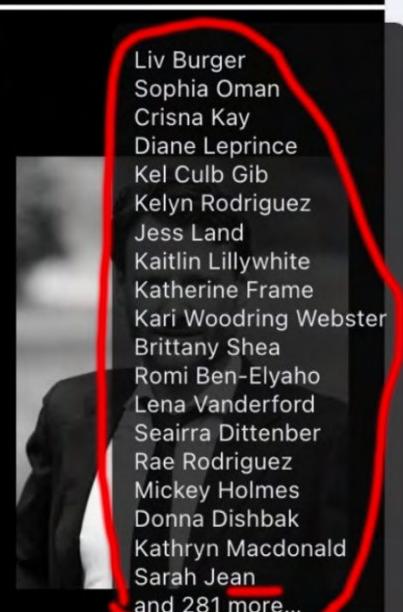


Kel Culb Gib

August 3, 2022 ·

...

▶▶▶ Tea in comments if approved- but I'm curious if anyone has met "Lucas" in person
(I'm not sure if that's even his real name)▶▶▶



Like Copy 34w

Kel Culb Gib Author

Bridget he also goes by Stewart, which according to all these lawsuits is his legal first name.

Like Reply 34w



Bridget Commented



5:50 ↗



Are We Dating The Same Guy? |
Los Angeles

Kel Culb Gib · Aug 3, 2022

...



Lena Vanderford

He is equally loved on social media....



1w Like Reply

1 Like

Kel Culb Gib
Lena zero followers lol

1w Like Reply

2 Likes

Kel Culb Gib Author

Lena zero followers lol

Like Reply 9w



Lauren-Ashleigh Christian

Lena Vanderford is that a cash tag in his bio?? Lmao 🤪

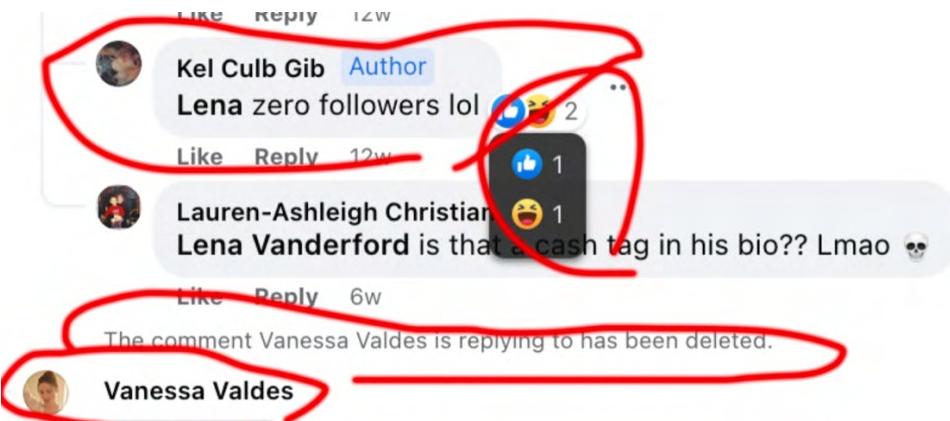
Like Reply 2w

The comment Vanessa Valdes is replying to has been deleted.

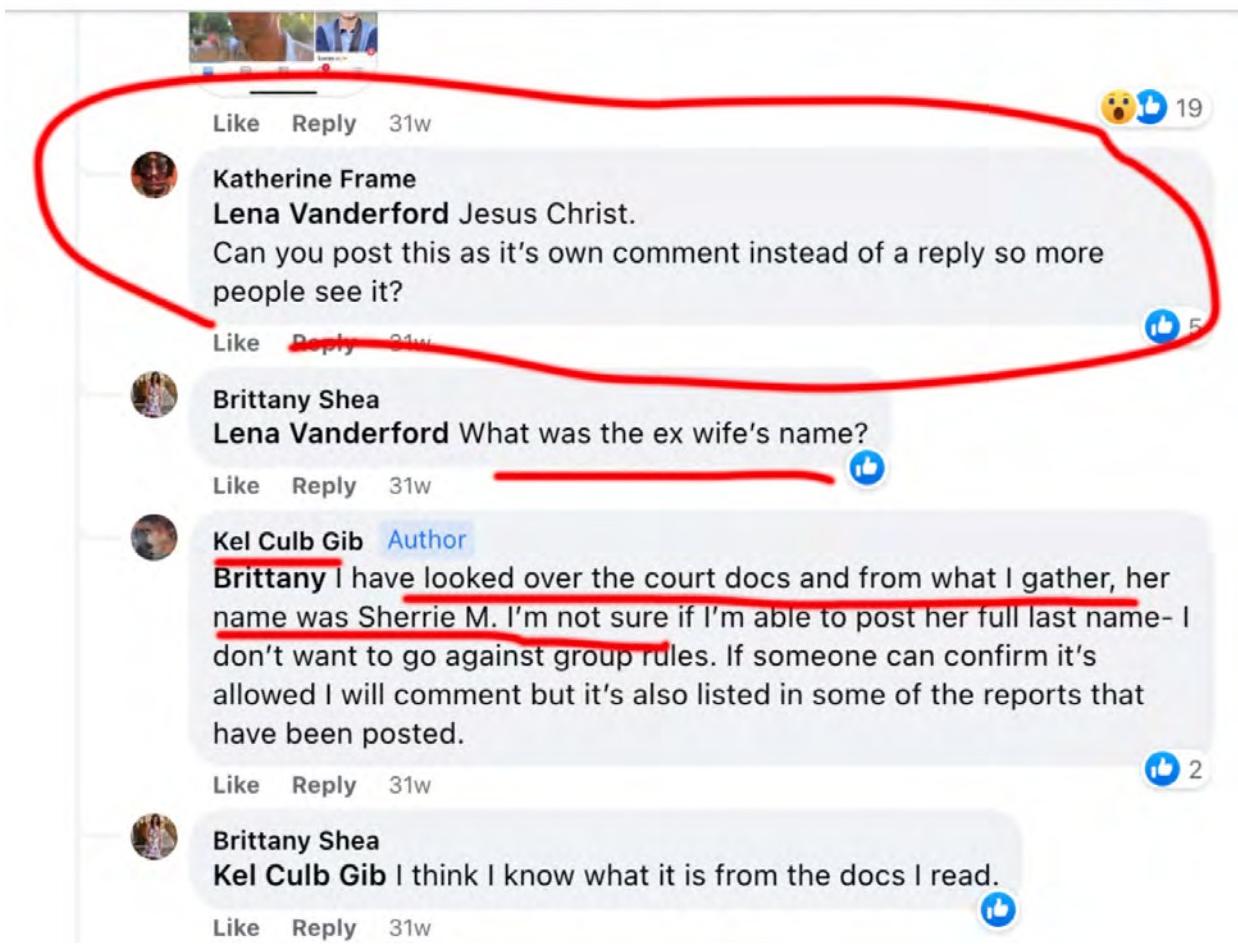


Vanessa Valdes





Kel's Post



9:29



Are We Dating The Same Guy? | Los Angeles

Kel Culb Gib · Aug 3 ·



Jamie Onuki

Okay her name was Sherrie Martinez

X

Kel's Post

Savannah Valencia read this it's crazy

Like Reply 27w



Kel Culb Gib Author

Hey everyone, I've tried reporting Lucas through Hinge a couple of times and haven't heard back.

I don't have Bumble so I'm unable to report him there, according to their website. Would anyone else be able to do it?

Like Reply 28w



Lena Vandeford

Kel Culb Gib I actually know someone on the board at Bumble. Did anyone find his Facebook or any social media, email etc? That will help get him banned

Like Reply 28w



Kel Culb Gib Author

Lena we found all of his lawsuits on Google by typing his name in. I know his Twitter and the cell number he gave me but not sure if it's still active. He doesn't seem to care about hiding so I'm sure his Facebook would be relatively easy to track down if he has one!

Like Reply 28w

Group member's Post

X



Group member Author

Stephanie Basey how come I can't find this post in this group ? Over 200 comments ~~0000~~ he also didn't have Lucas as his profile name. It was "ST" that's it. He told me Lucas later

Like Reply 17w



Stephanie Basey

Group member did you go to the magnifying glass in top right corner and type Lucas? So strange! I'm glad you know now!

Like Reply 17w



Kel Culb Gib

Group member his name is Stewart Lucas so that explains the "ST" but he probably has realized he is getting reported left and right so he's coming up with new ways to ID. I'm surprised he hasn't started using fake names considering his entire legal dumpsterfire is public record

Like Reply 17w Edited



Group member Author

Kel Culb Gib kind of makes it worse like he has no Shame

...

Like Reply 17w



Kel Culb Gib

Group member right?? A total sociopath.

Like Reply 17w



Group member's post



Christina Runnels

5:03 ↗

· · ·



St

YOU MATCHED WITH ST ON 11/11/22

hi beautiful, I'm sort of over online dating, how about a sunset stroll, maybe a glass of wine? hope you like published writers
310)804-0960, what's yours?

 Los AngelesKel Culb Gib · Aug 3 · 

we realized we met before an

8w Like Reply



Jamie Onuki

 Lucas Murrey
To: jamieonuki@gmail.com**New books, projects and court reporting services**

Dear Jamie,
nice seeing you, I may in fact have a job for you too. I'm into some writing and art projects supported by serious people. How about I tell you more with a phone call or facetime sometime, unless you prefer just to meet 424) [276-3017](tel:276-3017)

--
Dr. Lucas Murrey
Ph.D Yale University
Author of Hölderlin's Dionysiac Poetry and *Home: The Meaning of Earth*
lucas@lucasmurrey.com

8w Like Reply



Jamie Onuki

Okay her name was Sher

[The Prudential Insurance America v. Dr. Stewart Luc](#)

EXHIBIT D



Kel Culb Gib

Author Open to messaging

Eve Salazar he pressed lawsuits
against a number of women to extort
money from them and was suspected
in the murder of his ex wife. I think the
doc could investigate the murder
since he clearly didn't go to jail about
it and instead of accuse him just plant
seeds of speculation.

?

1d Like Reply

1 😱

EXHIBIT E

Kel's Post

X

One of your matches, Lucas M, was recently removed from Hinge based on information regarding potentially fraudulent behavior. We are notifying you because you matched with this user. While Hinge cannot verify the accuracy of such information, it advises you remain cautious in your online interactions with all individuals who you do not already know.

Like Reply 28w



Lena Vanderford

Kel Culb Gib yes! "Fraudulent" meaning abusive murderer? 😅

Like Reply 28w



Kel Culb Gib Author

Lena this was at the end of the email lol so I guess all his extortion lawsuits 🙄 they're gliding right on past that murder suspicion

* Fraudulent behavior includes but is not limited to using a false identity or posing a significant risk of attempting to obtain money from other users through deceitful means.

Like Reply 28w



Lena Vanderford

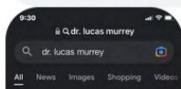
Kel Culb Gib I guess we should all be looking out for a fresh hinge profile

Like Reply 28w



Katherine Frame

Okay. So I googled and YIKES ON BIKES, here are the top google results:



8:23



<  Are We Dating The Same Guy? |
Los Angeles

★ Kel Culb Gib · 5d · E

Kel Culb Gib

Author ★ ...

Shady from what I've gathered he's either extorting or trying to extort money from multiple different sources. He and his lawyer seem to be very chummy so I'm sure there's some sort of deal going on there, too. 🤪

4d Like Reply

1 😱

Write a reply...



Mickey Holmes

I'm just floored reading all of these experiences....like ya know he's done bad stuff and has been able to get away with it for awhile.

4d Like Reply

2 🙌



Rae Rodriguez

ANYONE HAVE HIS DEETS FROM COLLEGE? WHAT DO HIS CLASSMATES SAY? I NEED TO KNOW MORE ➡

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Write a comment...



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Kel's Post

X



COURTLISTENER.COM

Docket for Dr. Stewart Lucas Murrey v. Cheaterreport.com,
2:21-cv-08140 - CourtListener.com

Like Reply 31w



Naomi Joy Garcia

MOTIONS: Plaintiff's Motion to Compel Further Responses to Form Interrogatories and Sanctions

HEARING DATE: 12/18/2020

Background/ Discovery Dispute

Plaintiff Dr. Stewart Lucas Murrey filed a complaint against Jenney Lee for intentional infliction of emotional distress and conversion. The parties were allegedly in a romantic relationship. Plaintiff alleges that Defendant tried to extort money from him by pretending to be someone else and claiming that she was pregnant. Defendant also allegedly destroyed some of Plaintiff's dress shirts and other personal property.

On August 28, 2020, Plaintiff filed a motion to compel further responses to form interrogatories, and requests sanctions.

Like Reply 31w



Kel Culb Gib Author

Naomi omg ... suing a company that catches cheaters and the suspicion of murdering his wife?! Dateline vibes.

Like Reply 31w



Kel Culb Gib Author

SeAirra Dittenber

Like Reply 29w



Crisna Kay

Someone tag me when op posts deets. This is insane



3

Like Reply 31w

View 1 more reply



Kel Culb Gib Author

Crisna I'm heading home from the studio right now to pour my tea but it



Kaitlin Lillywhite
I'm living for this thread

Like Reply 35w 23



Kel Culb Gib Author
UPDATE: REPORTED AND REMOVED FROM HINGE.

But he is obviously a predator so keep in mind he could make new profiles with new names or false info if his ego is damaged enough from being removed (he is an overt narcissist so caution is necessary!)

I don't have Bumble or Tinder so I'm not sure how to report him from there, if you've matched with him on either place I encourage you to try to have him removed from those as well.

STAY SAFE LADIESSSS!!

Notification from Hinge

H

One of your matches, Lucas M, was recently removed from Hinge based on information regarding potentially fraudulent* behavior. We are notifying you because you matched with this user. While Hinge cannot verify the accuracy of such information, it advises you to remain cautious in your online interactions with all individuals who you do not already know.

Like Reply 32w

7

↳ 1 Reply



that part of the populace they have brainwashed.

Lucas Murrey 26 June 2022 ④ 45
Share

← Back

Like Reply 35w

Nicole Burova
Katherine Frame he's a Dr??

Like Reply 35w

Donna Dishbak
Katherine Frame he should be in a mental ward!

Like Reply 35w

Kel Culb Gib **Author**
SeAirra Dittenber

11

...

1

3

8:23



<  Are We Dating The Same Guy? | ...
Los Angeles
★ Kel Culb Gib · 5d · E

At his age, that's a huge red flag ►

4d Like Reply

17 0 0

 Kel Culb Gib
Author ★ ...

Diane he told me about his published books and how he does podcasts with scholars. I didn't look up his books until last night but they're both about German poets/philosophers who were obsessed with Greek tragedy and Dionysian poetry which includes the balance between "terror and excitement" and society's focus on visualization in comparison to wealth and money as it relates to tragedy. Dude is basically obsessed with tragedy and money. His Twitter is full of Bitcoin garb and conspiracies.

4d Like Reply

3 1

 Diane Leprince

Kel Culb Gib I bet if we do some researches he doesn't have a phd. He maybe attended the program but never finished it....

Rules



Write a comment...



News



Marketplace



Feeds



Notifications



Menu

1:41

December 9, 2022
8:25 PM

Edit ...

Los Angeles

Kel Culb Gib · Aug 3 · 5



Carisa Ducommun lezza
Aka Dr. Stewart Lucas Murrey

4d Like Reply

1



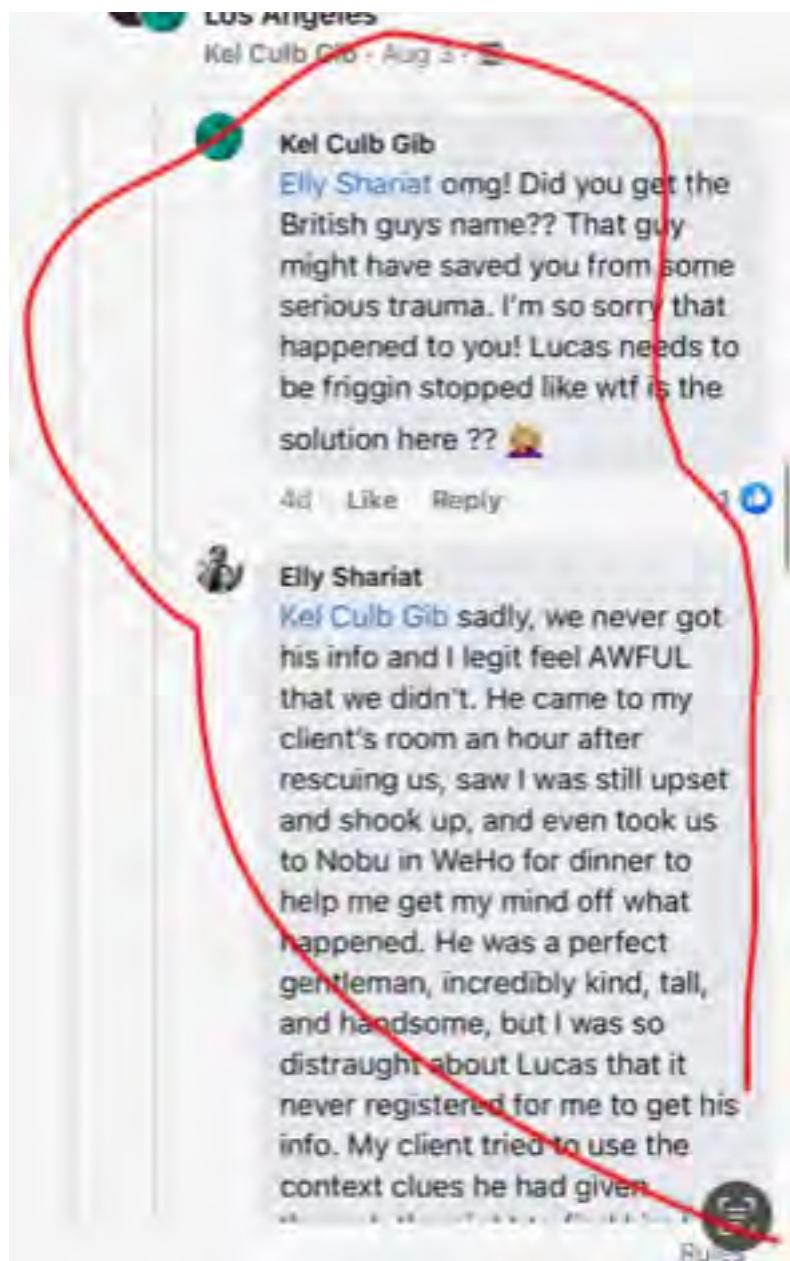
Elly Shariat

Matched with him on Tinder a few years back. He wanted to meet up IMMEDIATELY but I made it clear I couldn't because I had a client in town, also let him know my texts/replies wouldn't be timely because I'd be with my client and didn't want to be rude. He found my Instagram and even though I hadn't geo-tagged where in Beverly Hills I was, I guess he recognized the pool and at some point in the evening stopped by the hotel and sat down next to me and my client at the bar exclaiming "I've been looking for you all over town! You're a hard girl to pin down!" I was flabbergasted and freaking out because who tf does that?! To show up uninvited at a place I didn't tell you about? Luckily a British guy a few seats over heard everything and pretended like he knew me and my client,... See more

4d Like Reply

6

freaking out because who tf does that?! To show up uninvited at a place I didn't tell you about? Luckily a British guy a few seats over heard everything and pretended like he knew me and my client, apologized for having a call that ran long, and said why don't we go somewhere more private to discuss our work. At that point my client and I said sorry to Lucas and that we have to go with the British guy because there's a major deal we are working on so we left and Lucas huffed and puffed. (British guy had prepaid our tab, unbeknownst to us, so we wouldn't be hampered in trying to leave.) In the elevator the nice Brit mentioned how sorry he was for his gender and that seeing how distraught and panicked I was made him almost call the cops but that the bartender knew if Lucas tried to follow us to def call the cops. To this day I feel incredibly lucky that guy interjected and stepped in. Still thinking about that afternoon scares tf out of me. Lucas should NOT be allowed on any of these apps because he really is dangerous af.



Kel's Post

X

4 Replies



Katherine Frame

Okay. So I googled and YIKES ON BIKES, here are the top google results:



Like Reply 31w



View 2 previous replies



Kel Culb Gib Author

It takes a special kind of Narcissist to continue doing what he's doing with the information that is publicly available about him. It's giving full blown sociopath.

Like Reply 31w



Katherine Frame

Kel Culb Gib yup.

Like Reply 31w



Kari Woodring Webster

Wow. Talk about going down a rabbit hole. His Twitter makes him look insane and all the court cases. Wow

Like Reply 31w



Donna L Anderson

Kari Woodring Webster I wonder what they are for and how many were



St 44

Yale University
Straight Man
35 miles away



Like Reply 36w

View 1 more reply



Kel Culb Gib

Run. I'm the one who posted him in the LA group and it BLEW UP with horror stories. His legal dumpster fire is all public record on Google. It's quite the rabbit hole to fall into.



Like Reply 35w

EXHIBIT F

Like Reply 34W

Kel Culb Gib Author

This guy clearly has an affinity for lawsuits, ladies, so let's just not even mention this post 😂 Don't even tell your diaries 🙄

Like Reply 35W

4

Nicole Burova

Looks harmless and this is probably a paradigm example of looks being



Kel Culb Gib

Author Open to messaging

Kera H BJORNERUD we wouldn't have to mention the group at ALLLLL. Could just say I met a girl and talked about it and she had the same experience and knew someone else with the same experience and snowball from there!

1d Like Reply



Kel Culb Gib

Author Open to messaging

Kera H BJORNERUD or even just say I googled him when my gut told me to cancel because his lawsuits are ALLLLLLL public record and he uses his real name 🤪

1d Like Reply

1



Kel Culb Gib

Author Open to messaging

Actually just screenshot the pictures themselves, don't mention the group or show the group name at all.

1d Like Reply

 Kel Culb Gib

Author Open to messaging

Amy Blalock I know right? I really just wanna talk to all the other women and get the full range of stories 😂 I did post that after a few glasses of wine. I would be semi scared but interested. Have you see Love Fraud on Showtime? I imagine it would be like that where he agrees to be interviewed because of his ego but then just digs his whole deeper cause he's a sociopath 😂

1d Like Reply

 Kel Culb Gib

Author Open to messaging

Amy Blalock I just feel like with ALL the ~~traction~~- women need to be warned. Especially because I've seen him come up about 3 separate times since the post I made !

1d Like Reply

 Kel Culb Gib

Jacqui I can screen shot the message I sent these girls to give you an idea of what I was thinking

3d Like Reply

1 

 Jacqui Blue

Kel Culb Gib Yes, DM me.

3d Like Reply

 Kel Culb Gib

Jacqui Blue it might go to your requests (which I forget to check REGULARLY lol just fyi) if you don't see it in main

3d Like Reply

1 

Rules

9:14



Are We Dating The Same Guy? |
Los Angeles

Anonymous member · Feb 15 ·



Vanessa Values

Bump

3w Like Reply

2



Kcg Gib

Bumppp

3w Like Reply

1



Bonnie Rose Liedtke

Bump and this piece of crap.

3w Like Reply

1

Kel's post

Y'all I'm genuinely interested in figuring out a mini-doc vibe about that Lucas fellow 😂 who knows how to make this happen?

27 comments

Like

Comment

13

All comments ▾



Kel Culb Gib

Author Open to messaging

To refresh your memory... I'll add the link
so you can read the tea 🍵



Like

Reply

2



Kel Culb Gib

Author Open to messaging

 Kel Culb Gib

Vanessa Parrotta this is the main one I was talking about but I'll tag you in my other posts too

2w Like Reply

 Vanessa Parrotta

Kel Culb Gib unreal!!! But low key I'd be the one trying to check his freezer like someone else said 😂 I love a good mystery



Amy Blalock

We could all share our stories on the documentary like The Tinder Swindler.

Then again, I think this would boost his ego more.

Can't win with that guy.

Reply

3

 Kel Culb Gib

Author Open to messaging

Amy Blalock I know right? I really just wanna talk to all the other women and get the full range of stories 😂 I did post that after a few glasses of wine. I would be semi scared but interested. Have you see Love Fraud on Showtime? I imagine it would be like that where he agrees to be

5:39



<  Are We Dating The Same Guy? | ...
Los Angeles

Kel Culb Gib · Aug 3, 2022 · 🔍

 Kel Culb Gib

Emily it's anon I'll message it to
you

1w Like Reply

1 

 Kel Culb Gib

I messaged you but from the
looks of our last convo you might
have me blocked 😂😂

1w Like Reply

 Emily Noelle

Kel Culb Gib abahahahahahahah

1w Like Reply

1 

 Emily Noelle

Kel Culb Gib damn I unblocked
you but I still can't figure it out lol
I have an enormous amount of
ppl blocked.

1w Like Reply

1 

 Kel Culb Gib

Emily maybe check requests?

1w Like Reply



Kel Culb Gib

Open to messaging 2d ·

Y'all I'm genuinely interested in figuring out a mini-doc vibe about that Lucas fellow 😂 who knows how to make this happen?

13

27 comments

Like

Comment



Bridget Garwood ☕

Kel Culb Gib shoot me a message about what you had in mind structure/storyline wise! I might be able to help.

1d Like Reply

1



Kel Culb Gib

Author Open to messaging

Bridget Garwood I'll send you a message with just what I was thinking with the help of my good friend

Cabernet last night 😂. If it's any sort of plausible we can hit up Abby Meininger and work it out 😂

1d Like Reply

9:40 1



<  Are We Dating The Same Guy? | ...
Los Angeles

Kel Culb Gib · Nov 14 · ...



Abby Meininger

I'm a documentary filmmaker! Let's do it

6d Like Reply

11 



Jacqui Blue

Me too! I'll help! A documentary about
dating and dating apps alone would
be great.

3d Like Reply

2 



Kel Culb Gib

Jacqui I can screen shot the
message I sent these girls to give
you an idea of what I was thinking

3d Like Reply

1 



Jacqui Blue

Kel Culb Gib Yes, DM me.

3d Like Reply



Kel Culb Gib

Jacqui Blue It might go to your
requests (which I forgot to check
REGULARLY lol just fyi) if you
don't see it in main

3d Like Reply

1 



abby_normal_adventures

Follow

...

396 posts

1,435 followers

4,028 following

A.J. Meininger she/her

📍 San Francisco

🎥 Film Producer | Director | 1st AD

MFA SF State 🏔 Hiker

Master of Some

🔗 linktr.ee/Abbyjcpc



Blazer life



#film



Shoot your s...

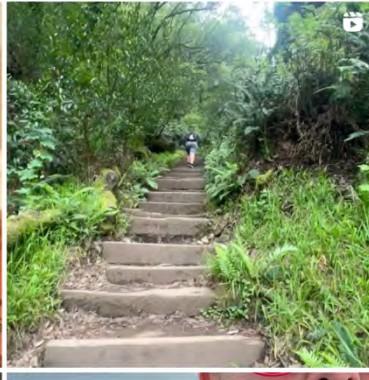


Highlights

.posts

reels

tagged



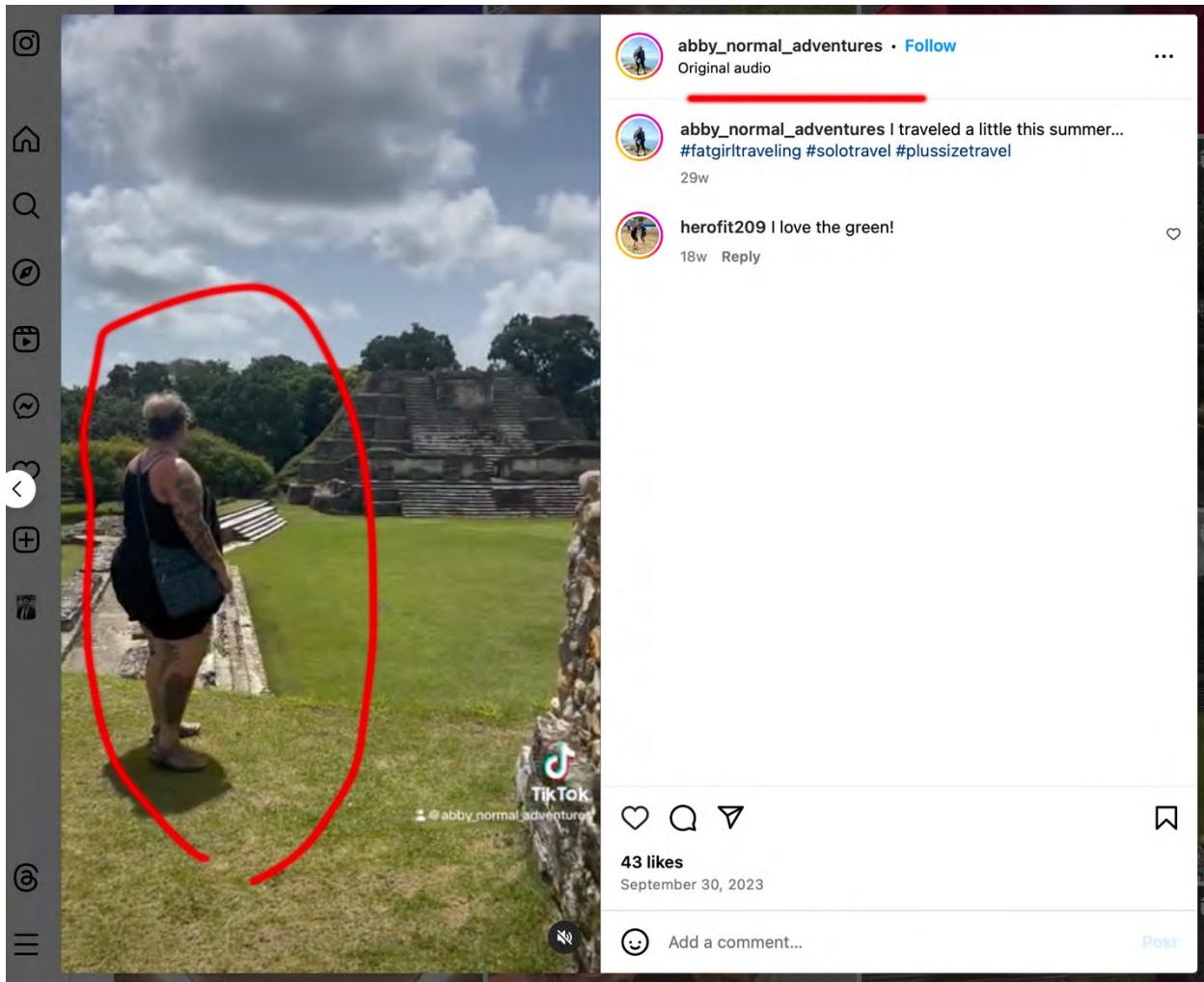


EXHIBIT G

Kel Culb Gib

Donna he unmatches people to make it harder to report him. I just got him removed from hinge for however long a ban like that lasts. I googled and it said bans last for 1-2 days up to a month depending on the offense.

5d Like Reply

1 😊

To report someone you're not matched with:

1. Open their profile.
2. Scroll down and select the option to Report.

Reporting someone on Tinder – Tinder

👉 www.help.tinder.com/hc/en-us/articles/115003359426-Reporting-someone-on-...

EXHIBIT H

 LOS Angeles

Kel Culb Gib · 4d · 



Lea Stuff

This is not okay stop gossiping about this dead man

3d Like Reply

5  



Kel Culb Gib

Lea to be fair I had no idea he had passed when I made the post. Just to be clear, it's okay to gossip about men who are alive and not able to see the page or defend anything but not ones who unknowingly passed?

3d Like Reply

7  



Kel Culb Gib

Lea this page is supposed to be a safe space to call out men who have been disrespectful. That's what he did. Him dying doesn't change his behavior in life.

3d Like Reply

20  

 Are We Dating The Same Guy? |
Los Angeles

 Kel Culb Gib · 4d · ...

Such a waste of a 6'4" 😭😭

4d Like Reply

16   

 Kel Culb Gib

 Author ...

Sapphie right??

4d Like Reply

 Sapphie Davis

Kel Culb Gib and impressive down
there. Double whammy. Lol!!!

4d Like Reply

1 

 Kel Culb Gib

 Author ...

Sapphie I'm not gonna lie it was
nice. But you can check it out on
Cinemax if you're curious 😊

7 

 Kel Culb Gib

 Author ...

I feel like those are red flags to
me at this point tho. I've never
met a 6'4 dude w a nice dick who
wasn't a total fuckboy. 🙄



Kel's post

...



Kel Culb Gib

Author Open to messaging

Bridget Garwood I'll send you a message with just what I was thinking with the help of my good friend

Cabernet last night 😂. If it's any sort of plausible we can hit up Abby Meininger and work it out 😂

1d Like Reply



Kel Culb Gib

Author Open to messaging

Donna Dishbak I know I know, I had some wine and was sort of joking but I do think it would be really interesting to see what all we discover and to interview the (at least 11) women the has sued to hear their side of things!!

1d Like Reply

1



Donna Dishbak

Kel Culb Gib you can still do it, just get your sources triple-checked and take many precautions.

1d Like Reply

1

**Liv Burger**

He had a partner 10000%.

Something similar happened to me years ago. Was on a layover in different city. Went to eat at a bar across the street from the hotel. Met a guy there and turns out he was staying at the same hotel. After talking for a while at the bar I invited him back to my room and we talked for a few more hours and things were starting to get hot and heavy.

He said he was gunna go grab a condom from his room and then just never came back. I was confused so I took the details he had told me (hometown, company he worked for, name) and quickly found his fb. His cover photo was of his wife and their newborn child. 😳

I've had experiences since that seemed totally explainable on their end only to find out that they're cheating. It's becoming super common unfortunately. Sorry that happened, best to just block and move on!

1y Like Reply

22 😱

Are We Slandered By the Same Girl? Or...



Are We Slandered By the Same Girl?
Orange County -Huntington Beach - Irvine

· Follow

6d · 🌎

Here they are Amir trying to gossip mill and keep you out of the dating pool.

"I didn't get good vibes"
Sounds like a high school locker room!

Gee, IDK Liv Burger, maybe people change? We didn't get good vibes from your comments either.

Like

Comment

Send

Share



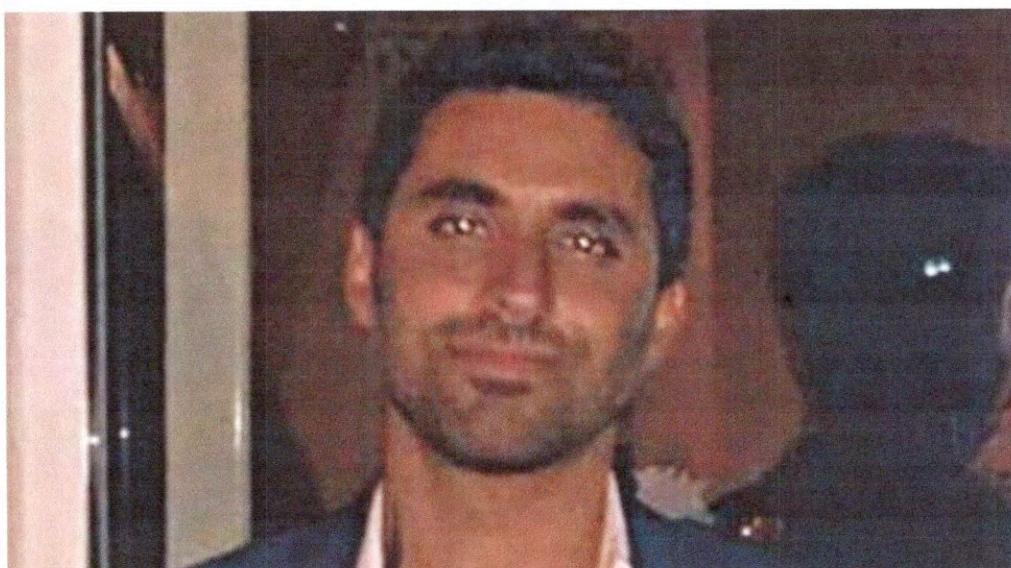
Are We Datin...



Anonymous member

1h · 🌎

Has anyone matched with this guy?
He says his name is Amir from LA



Message Are We Slandered By the Same G...

◀ liv burger

All

Posts

People

Reels

Groups

Pages



Are We Slandered By the Same Girl?

...

Orange County -Huntington Beach -

Irvine · Follow

Feb 20 · 🌎

Here they are Amir trying to gossip mill and keep you out of the dating pool.

"I didn't get good vibes"
Sounds like a high school locker room!

Gee, IDK Liv Burger, maybe people change? We didn't get good vibes from your comments either.

◀ Are We Datin... 🔍 ↗ comments ▾



Anonymous member

1h · 🌎

Has anyone matched with this guy?
He says his name is Amir from LA



5 comments

Like

Comment

Send



Liv Burger

Matched aages ago, 5+ years.
Had the same photo back then.
Didn't get good vibes. Never met.

Like Reply

1 ⏱

Liv Burger

Matched aaages ago, 5+ years.
Had the same photo back then.
Didn't get good vibes. Never met.

15m Like Reply

1 ⏱ Anonymous member Liv Burger thanl



Home



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Kcg Gib

My current partner and I are both ASD (tho his presents differently than mine in a lot of ways). It was pretty obvious to me for a few reasons, especially being on the spectrum myself, but for starters - he's incredibly literal and takes things that people say very literally as well. Probably one of the more obvious signs is that he's beyond knowledgeable/informative about his "special interests" which for him include film, tv, marvel, and motorcycles- I'm currently on movie # 22 of 33 Marvel movies because I had never seen them and he immediately insisted we start a marathon (in order 😊). A lot of people on the spectrum have sensory issues; he won't wear socks because of this lol. Sometimes it can seem like he is being rude w his bluntness but he's j... See more

10W Like Reply

13



Kel Culb Gib

My ex broke up with me because of my weight. He made comments throughout the relationship and I relapsed with disordered eating and had lost 20lb over 7 or 8 months when I walked in on him cheating with another girl. He ultimately told me he only cheated cause he's not used to dating women as "big" as I am and he wasn't physically attracted to me. That was 2 years ago and my disordered eating has gone the opposite way now, so I've gained 30 lbs and feel uncomfortable even trying to put myself out there to meet someone new.

This kind of thing really fucks with our self image. I hope she is okay 😢. And good on you for standing up for her and recognizing harmful behavior before it got too far.

10:21



Are We Dating The Same Guy? |

Los Angeles

Anna Kate · Feb 15 · 5

...

has gone the opposite way now, so I've gained 30 lbs and feel uncomfortable even trying to put myself out there to meet someone new.

This kind of thing really fucks with our self image. I hope she is okay 😊. And good on you for standing up for her and recognizing harmful behavior before it got too far.

1w Like Reply

2 0 5



Kel Culb Gib

Months later he apologized and said he was projecting his own insecurities about his (very fit?) body. But the damage was already done. He knew my biggest insecurity and made it bigger. The apology didn't make me feel better about myself.

1w Like Reply

1 0

Like Reply 35w



Kel Culb Gib Author

Ask and ye shall receive. Here is the disturbing video of he and his lawyer/friend. Please note that the video doesn't end when the screen goes blank, that's just the part where it turns from bizarre to creepy.



Like Reply 35w



Kel Culb Gib Author



Like Reply 35w



Kel Culb Gib Author

Ask and ye shall receive. Here is the disturbing video of he and his lawyer/friend. Please note that the video doesn't end when the screen goes blank, that's just the part where it turns from bizarre to creepy.

...



Like Reply 35w



5

Kel Culb Gib Author

Jenna Seppa



The comment Kel Culb Gib is replying to has been deleted.

 **Kel Culb Gib** Author

Liv It was seriously so bizarre. They started talking like it was just a regular convo and not strange at all. It was so odd that it seriously crossed my mind like... what if this guy is like using someone to trace my call? But I watch a lot of Dateline lol. After reading all these comments tho I am like geez I might not have been too far off!

Like Reply 35w



The comment Kel Culb Gib is replying to has been deleted.

 **Kel Culb Gib** Author

Marianne Liv Omg that makes sense! I wish I could remember how the convo went specifically but I was so weirded out that my brain just went into flight mode.

Like Reply 35w



The comment Krystal Paige Haddadin is replying to has been deleted.

 **Krystal Paige Haddadin**

Liv Burger no attorney would waive privilege like this lol bet that guy wasnt even a real attorney

...

Like Reply 34w



The comment Kel Culb Gib is replying to has been deleted.

 **Kel Culb Gib** Author

Krystal unfortunately he is, I looked him up. 10 years in practice.

Like Reply 34w

...

The comment Kel Culb Gib is replying to has been deleted.

 Teal Muah
Angelina Beeby



Like Reply 34w

Kel Culb Gib Author

SeAirra Dittenber this is the video I was mentioning

Like Reply 33w

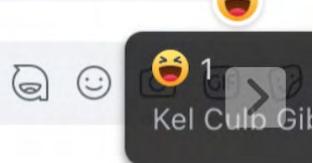
Lindsay Alexandra

Kel Culb Gib I'm sorry the lawyer looks like Harry from sex and the city



Like Reply 32w

Reply to Kel Culb Gib...



comment Kel Culb Gib is replying to has been deleted.

Culb Gib Author

It was seriously so bizarre. They started talking like it was just a regular vo and not strange at all. It was so odd that it seriously crossed my mind ... what if this guy is like using someone to trace my call? But I watch a lot of Dateline lol. After reading all these comments tho I am like geez I ht not have been too far off!

Reply 35w



comment Kel Culb Gib is replying to has been deleted.

Culb Gib Author

Iarianne Liv Omg that makes sense! I wish I could remember how the vo went specifically but I was so weirded out that my brain just went into fight mode.

Reply 35w



1:09



Are We Dating The Same Guy? | Los Angeles

Kel Culb Gib · Aug 3 ·

point of this video? It's not funny,
artistic, mind provoking...
anything.

3w Like Reply



Kel Culb Gib

Donna it makes ZERO sense. And
it's super uncomfortable.

Screams of instability 😱.

3w Like Reply

1



Kel Culb Gib

SeAirra Dittenber this is the video
I was mentioning

1w Like Reply



Lindsay Alexandra

Kel Culb Gib I'm sorry the lawyer
looks like Harry from sex and the
city 😂😂😂😂

4d Like Reply

1

8:22



Are We Dating The Same Guy? |

Los Angeles

★ Kel Culb Gib · 5d · ...



Tara Wujcik

Kel Culb Gib I feel like I just had a brain bleed. WTF was that? Very strange conspiracy theory behavior without ever sticking the point. Vegas odds that either of them have ever found the clit? I bet they've got a conspiracy theory of it's existence.

3d Like Reply

1 🍑



Kel Culb Gib

Author ★ ...

Tara it gives like bad horror movie vibes. So cringey.

3d Like Reply

2 💬



Tara Wujcik

Kel Culb Gib Bullet; Dodged. Can someone check his freezer though? Dude is unhinged.

3d Like Reply

1 💬



Kel Culb Gib

Author ★ ...

Tara that would mean someone would have to come to his manu

Rules



Write a comment...











2121 Crenshaw Blvd

2121 Crenshaw Blvd, Los Angeles, CA 90016

2MQ9+C4 Los Angeles, California

Suggest an edit on 2121 Crenshaw Blvd

Add a missing place

Add your business

Photos

Directions Save Nearby Send to phone Share

Restaurants Hotels Things to do Transit Parking Pharmacies ATMs 7-Eleven Washington Branch Library Sign In

Mexico Mufflers Muffler shop Jehovans Witnesses Wellington Square Farmers Market Mobil Choose better gas mileage! Jack in the Box Perfectly Caramelized Onions Planet Fitness St Pauls Schoo United States Postal Service Chain Reaction W 21st St W 22nd Pl INT, INC Computer software store American Car Wash OttoENV LA Express Carpet Cleaning services

West Blvd Buckingham Rd Virginia Rd Wellington Rd Crenshaw Blvd S. Victoria Ave W 23rd St W 23rd St Crenshaw Blvd Santa Monica Fwy W 25th St Victoria Ave Google Layers

EXHIBIT I

7:30

April 1
9:49 PM

Edit

gofundme



Legal Defense Fund for
Women of LA

\$4,987 raised of \$60,000 goal • 147 donations

Donate now

Copy link

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WhatsApp

Text

More

11:36



Facebook

www.gofundme.com



Sincerely,

Vanessa Valdes, Olivia Burger, Kelly Gibbons, Amy Blalock, Elly Shariat, and Kelyn Rodriguez.



Vanessa Valdes
\$10,000 raised of \$10,000 goal
10 donors

Share Donate





Kcg Gib

[Posts](#)[Photos](#)

Kcg Gib

2d ·

...

Making our GoFundMe link public to hopefully have it shared. We really need some traction on this. Our first hearing is on Wednesday and we still haven't secured legal representation. This lawsuit is just another form of harassment by a man I've never even met. While it's completely frivolous, we will not be silenced. Please consider sharing and donating- we would really appreciate it

[gofundme.com](#)

Legal Fund for the Women of AWDTSG LOS ANGELES, organized by Anonymous Defendant



1

9:04 5G

Anonymous member - Feb 15 -

amy blalock in Are We Dating The...

Filters Posts You've Seen Most Recent Posts

Are We Dating The Same Guy? | Los Angeles

Anonymous member - Feb 15 -

Hey ladies! Unfortunately, word about a post on this page reached the man in question and he has chosen to take legal action against myself along with 50+ women who either commented or hit "like" on the thread 😊

The situation is an annoyance, but a group of us are taking action against this man for a number of reasons- mostly to try to keep this from happening to any other woman who speaks out in order to protect others from dangerous people.

We are currently seeking legal representation and taking our story public this week, but have already had a ton of fees associated with filing and answering to this suit and anticipate even more in the upcoming days alongside legal/lawyer fees.

I'm linking our GoFundMe below- please feel free to share it separately from the group! We can use any and all help we can get!

Please stay safe out there girls! ☺

https://www.gofundme.com/f/legal-fund-for-the-women-of-awdtsg-los-angeles?utm_campaign=p_cpi+share-sheet&utm_medium=copy_link_all&utm_source=customer

Home Video Marketplace Bands Notifications More

Vanessa Valdes
Bump 2

Kcg Gib
Bumppp 1

Bonnie Rose Liedtke
Bump and this piece of crap. 🙄 1

Gloria Liu
Who is the plaintiff?

Anonymous member
Gloria Liu don't want to mention names since that's how we got into this mess 😊
Case number 23STCV14890

Anonymous member - Feb 15 •

 **Michelle Grappo**
Bump
3w Like Reply 1

 **Anonymous member**
Bump
3w Like Reply

 **Anonymous member**
Bump
3w Like Reply

 **Anonymous member**
Hi ladies, an LA man is currently suing a group of 50 women, including myself, for sharing their experiences with him on this group. Here's a link to our GoFundMe page - please consider donating or sharing 🙏
<https://www.gofundme.com/f/legal-fund-for-the-women-of-awdtsg-los-angeles>

 **Legal Fund for the Women of AWDTSG LOS ANGELES, organi...**
gofundme.com

3w Like Reply 10



LAW & CRIME

~~Accusation actually harassed them on dating apps, defendants say~~

MARISA SARNOFF | Mar 24th, 2024, 9:43 am

8 comments

SHARE



Olivia Berger, left, and Vanessa Valdes, right, speak at a press conference on behalf of women being sued by Stewart





thetimes.co.uk



MENU

THE  TIMES

THURSDAY APRIL 11 2024

Subscribe



Vanessa Valdes and Olivia Berger are among the defendants in the defamation and privacy case brought by Stewart Lucas Murrey

Man sues more than 50 women for calling him a bad



Kcg Gib

3d ·

...

Most relevant ▾



R.C. Salane

Pardon what do you mean this weirdo showed up at your home?? This story truly gets wilder at every turn.

3d Like



Kcg Gib

R.C. 😊 truuuuly 😊

3d Like



Mark DeLisle

R.C. Salane dude showed up to serve her. She's never even met him in person and he knew where she lived and showed up personally.

Dude should have been put 6ft under in the desert somewhere with some pepper on top already.

Kcg Gib I only know you through Michele but I read the article last night... insane. I'd say this guy should be in a mental institution but he's past that, he needs to be deleted.

Sorry you're going through this.



This incident has been reported to the
Los Angeles Police Department
and is pending approval

Los Angeles Police Department
100 West 1st Street Room
Los Angeles, CA 90012
877-275-5273

General Information

Incident Type Harassing/Annoying Phone Calls
Tracking Number 240429900441
Report Date 04/29/2024 07:30 PM

Reporting Person Information

Name Murrey, Stewart Lucas
Home Address [REDACTED]
Primary Phone <b style="color:red;"><b <p style="font-size:12px;"> (Please include the dashes in the number)
Work Phone X
Race White
Gender Male
Date of Birth [REDACTED]
Driver License No [REDACTED]
Licensing State CA
Age 600
Height 185
Weight Blue
Eye Color Brown
Hair Color

Incident Information

Incident Location [REDACTED]
Enter the date/time when you began receiving harassing/annoying communication. 04/17/2024 12:00 PM
Enter the date/time when you stopped receiving harassing/annoying communication. 04/29/2024 07:15 PM
Location Type Internet or Cyberspace
On what device did you receive the harassing or annoying communication? Other electronic communication device
What type of harassing or annoying communication are you receiving? Social media message
How frequently are you being harassed? 0-10 times an hour
Did you tell the caller to stop contacting you? No

Person Information

No 1
Involvement Suspect
Name DeLisle, Mark
Work Phone X
No 2
Involvement Suspect
Name Gibbons, Kelly
Home Address 2121 Crenshaw Boulevard, Los Angeles, CA 90016, US
Work Phone X

Narrative

Incident Description

I am currently a plaintiff in an action against multiple defendants who stalked, harassed and cyberbullied me (LASC case no. 23STCV14890). After properly serving my lawsuit to one defendant who secretly stalked and cyberbullied me for over a year after I rejected her and blocked her, Kelley Gibbons aka Kel Culb Gib aka kcg, Gibbons misconstrued events to act as if she was a victim for simply having been served my lawsuit properly. Gibbons used her false representation to incite violence and even death threats against me on Facebook. This is shown in the death threat that Mark DeLisle made in response to Gibbons misconstruing of events. DeLisle, who I do not know, who has no knowledge of this case and who is obviously an ignorant individual, states: "Dude should have been put 6ft under in the desert somewhere with some pepper on top already." DeLisle allegedly lives in north Hollywood. Kelly Gibbons is well known for catfishing, so I also include a more realistic picture of her.

You will be notified via email of any problems with your report. Once your report is approved, it will be issued a case number and you will receive a PDF copy as an attachment in your email within approximately five business days.

[Print This Report](#)

RESPONDENT'S COPY

CH-109**Notice of Court Hearing****① Person Seeking Protection**

a. Your Full Name:

Dr. Stewart Lucas Murrey

Your Lawyer (if you have one for this case):

Name: _____ State Bar No.: _____

Firm Name: _____

b. Your Address (*If you have a lawyer, give your lawyer's information. If you do not have a lawyer and want to keep your home address private, you may give a different mailing address instead. You do not have to give telephone, fax, or email.*)

Address: 1217 Wilshire Blvd. # 3655

City: Santa Monica State: CA Zip: 90403

Telephone: (424) 278-3017 Fax: _____

Email Address: 2@lucasmurrey.io

Clerk stamps date here when form is filed.

Electronically FILED

Superior Court of California

County of Los Angeles

06/13/2024 1:39 PM

David W. Slayton

Executive Officer/Clerk of Court,

By P. Rodriguez, Deputy Clerk

Fill in court name and street address:

**Superior Court of California, County of
Los Angeles
111 N. Hill St.
Los Angeles, CA 90012**

Central District

Court fills in case number when form is filed.

**Case Number:
24STR004183****② Person From Whom Protection Is Sought**

Full Name: Kelly Gibbons

*The court will complete the rest of this form.***③ Notice of Hearing**

A court hearing is scheduled on the request for restraining orders against the person in ②:

Name and address of court if different from above:

Hearing Date→ Date: 07/08/2024 Time: 08:30AM
Dept.: 25 Room: 317_____
_____**To the person in ②:**

- If you attend the hearing (in person, by phone, or by videoconference) and the judge grants a restraining order against you, the order will be effective immediately, and you could be arrested if you violate the order.
- If you do not attend the hearing, the judge may still grant the restraining order that could last up to five years. After you receive a copy of the order, you could be arrested if you violate the order.

④ Temporary Restraining Orders (*Any orders granted are on form CH-110, served with this notice.*)a. Temporary Restraining Orders for personal conduct and stay-away orders as requested in form CH-100, *Request for Civil Harassment Restraining Orders*, are (check only one box below):(1) All GRANTED until the court hearing.(2) All DENIED until the court hearing. (*Specify reasons for denial in b, below.*)(3) Partly GRANTED and partly DENIED until the court hearing. (*Specify reasons for denial in b, below.*)

- b. Reasons for denial of some or all of those personal conduct and stay-away orders as requested in form CH-100, *Request for Civil Harassment Restraining Orders*, are:

- (1) The facts as stated in form CH-100 do not sufficiently show acts of violence, threats of violence, or a course of conduct that seriously alarmed, annoyed, or harassed the person in ① and caused substantial emotional distress.
- (2) Other (specify): As stated on Attachment 4b.

There is a related case set for hearing
in Dept. 25 on July 11, 2024.

There must be an evidentiary hearing
set in this matter as further

5 Confidential Information Regarding Minor

- a. A *Request to Keep Minor's Information Confidential* (form CH-160) was made and GRANTED. (See form CH-165, Order on Request to Keep Minor's Information Confidential, served with this form.)
- b. If the request was granted, the information described in item ⑦ on the order (form CH-165) must be kept CONFIDENTIAL. The disclosure or misuse of the information is punishable as a sanction, with a fine of up to \$1,000 or other court penalties.

6 Service of Documents for the Person in ①

At least five days before the hearing, someone age 18 or older—not you or anyone to be protected—must personally give (serve) a court's file-stamped copy of this form CH-109 to the person in ② along with a copy of all the forms indicated below:

- a. CH-100, *Request for Civil Harassment Restraining Orders* (file-stamped)
- b. CH-110, *Temporary Restraining Order* (file-stamped) IF GRANTED
- c. CH-120, *Response to Request for Civil Harassment Restraining Orders* (blank form)
- d. CH-120-INFO, *How Can I Respond to a Request for Civil Harassment Restraining Orders?*
- e. CH-170, *Notice of Order Protecting Information of Minor* and CH-165, *Order on Request to Keep Minor's Information Confidential* (file-stamped) IF GRANTED
- f. Other (specify): _____

06/13/2024

Date: _____



Debra R. Archuleta
JUDGE

Judicial Officer

To the Person in ①:

- The court cannot make the restraining orders after the court hearing unless the person in ② has been personally given (served) a copy of your request and any temporary orders. To show that the person in ② has been served, the person who served the forms must fill out a proof of service form. Form CH-200, *Proof of Personal Service*, may be used.
- For information about service, read form CH-200-INFO, *What Is "Proof of Personal Service"?*
- You may ask to reschedule the hearing if you are unable to find the person in ② and need more time to serve the documents, or for other good reasons. Read form CH-115-INFO, *How to Ask for a New Hearing Date*.
- You must attend the hearing if you want the judge to make any of the orders you requested on form CH-100, *Request for Civil Harassment Restraining Orders*. Bring any evidence or witnesses you have. For more information, read form CH-100-INFO, *Can a Civil Harassment Restraining Order Help Me?*

To the Person in ②:

- If you want to respond to the request for orders in writing, file form CH-120, *Response to Request for Civil Harassment Restraining Orders*, and have someone age 18 or older—not you or anyone to be protected—mail it to the person in ①.
- The person who mailed the form must fill out a proof of service form. Form CH-250, *Proof of Service by Mail*, may be used. File the completed form with the court before the hearing and bring a copy with you to the court hearing.
- Whether or not you respond in writing, go to the hearing if you want the judge to hear from you before making an order. You may tell the judge why you agree or disagree with the orders requested.
- You may bring witnesses and other evidence.
- At the hearing, the judge may make restraining orders against you that could last up to five years and may order you to turn in to law enforcement, or sell to or store with a licensed gun dealer, any firearms (guns) and firearm parts that you own or possess. This includes firearm receivers and frames, and any item that may be used as or easily turned into a receiver or frame (see Penal Code section 16531).
- If you are unable to attend your court hearing or need more time to prepare your case, you may ask to reschedule your court date. Read form CH-115-INFO, *How to Ask for a New Hearing Date*.

**Request for Accommodations**

Assistive listening systems, computer-assisted real-time captioning, or sign language interpreter services are available if you ask at least five days before the hearing. Contact the clerk's office or go to www.courts.ca.gov/forms for *Disability Accommodation Request* (form MC-410). (Civ. Code, § 54.8.)

(Clerk will fill out this part.)

—Clerk's Certificate—

I certify that this *Notice of Court Hearing* is a true and correct copy of the original on file in the court.



Date: _____

06/13/2024

P. Rodriguez

Clerk, by _____, Deputy

CH-100

Request for Civil Harassment Restraining Orders

Clerk stamps date here when form is filed.

Read *Can a Civil Harassment Restraining Order Help Me?* (form CH-100-INFO) before completing this form. Also fill out *Confidential CLETS Information* (form CLETS-001) with as much information as you know.

① Person Seeking Protection

a. Your Full Name:
Dr. Stewart Lucas Murrey Age: 50

Your Lawyer (*if you have one for this case*)
Name: _____ State Bar No.: _____
Firm Name: _____

b. Your Address (*If you have a lawyer, give your lawyer's information. If you do not have a lawyer and want to keep your home address private, you may give a different mailing address instead. You do not have to give telephone, fax, or email.*)

Address: 1217 Wilshire Blvd. # 3655

City: Santa Monica State: CA Zip: 90403

Telephone: (424) 278-3017 Fax: _____

Email Address: 2@lucasmurrey.io

FILEDSuperior Court of California
County of Los Angeles**JUN 13 2024**

David W. Slayton, Executive Officer/Clerk of Court
By: A. Napolis, Deputy

Fill in court name and street address:

**Superior Court of California, County of
Los Angeles**
111 N. Hill St.
Los Angeles, CA 90012
Central District

Court fills in case number when form is filed.

Case Number:**24STR004183**

② Person From Whom Protection Is Sought

Full Name: Kelly Gibbons Age: 38

Address (*if known*): 2121 Crenshaw Blvd.

City: Los Angeles State: CA Zip: 90016

③ Additional Protected Persons

a. Are you asking for protection for any other family or household members? Yes No *If yes, list them:*

Full NameGenderAgeLives with you?How are they related to you? Yes No _____ Yes No _____ Yes No _____ Yes No _____

Check here if there are more persons. Attach a sheet of paper and write "Attachment 3a—Additional Protected Persons" for a title. You may use form MC-025, Attachment.

b. Why do these people need protection? (*Explain below*):

Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 3b—Why Others Need Protection" for a title.

This is not a Court Order.


7 a. (3) How did the person in ② harass you? (Explain below):

Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 7a(3)—Describe Harassment" for a title.

(4) Did the person in ② use or threaten to use a gun or any other weapon?

Yes No (If yes, explain below):

Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 7a(4)—Use of Weapons" for a title.

(5) Were you harmed or injured because of the harassment?

Yes No (If yes, explain below):

Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 7a(5)—Harm or Injury" for a title.

My private information was shared, I have been gang-stalked and cyberbullied for years and I now suffer from anxiety, insomnia, paranoia and fear while I continue to receive death threats

(6) Did the police come? Yes No

If yes, did they give you or the person in ② an Emergency Protective Order? Yes No

If yes, the order protects (check all that apply):

Me The person in ② The persons in ③.

(Attach a copy of the order if you have one.)

b. Has the person in ② harassed you at other times?

Yes No (If yes, describe prior incidents and provide dates of harassment below):

Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 7b—Previous Harassment" for a title.

This is not a Court Order.

(11) Temporary Restraining Order

I request that a Temporary Restraining Order (TRO) be issued against the person in (2) to last until the hearing. I am presenting form CH-110, *Temporary Restraining Order*, for the court's signature together with this *Request*.

Has the person in (2) been told that you were going to go to court to seek a TRO against him or her?

Yes No (*If you answered no, explain why below:*)

Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 11—Temporary Restraining Order" for a title.

In fear of retaliation.

(12) Request to Give Less Than Five Days' Notice of Hearing

You must have your papers personally served on the person in (2) at least five days before the hearing, unless the court orders a shorter time for service. (Form CH-200-INFO explains What Is "Proof of Personal Service"? Form CH-200, Proof of Personal Service, may be used to show the court that the papers have been served.)

If you want there to be fewer than five days between service and the hearing, explain why below:

Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 12—Request to Give Less Than Five Days' Notice" for a title.

(13) No Fee for Filing or Service

- a. There should be no filing fee because the person in (2) has used or threatened to use violence against me, has stalked me, or has acted or spoken in some other way that makes me reasonably fear violence.
- b. The sheriff or marshal should serve (notify) the person in (2) about the orders for free because my request for orders is based on unlawful violence, a credible threat of violence, or stalking.
- c. There should be no filing fee and the sheriff or marshal should serve the person in (2) for free because I am entitled to a fee waiver. (You must complete and file form FW-001, Application for Waiver of Court Fees and Costs.)

(14) Lawyer's Fees and Costs

I ask the court to order payment of my lawyer's fees Court costs.

The amounts requested are:

Item	<u>Amount</u>	Item	<u>Amount</u>
	\$ _____		\$ _____
	\$ _____		\$ _____
	\$ _____		\$ _____

Check here if there are more items. Put the items and amounts on the attached sheet of paper or form MC-025 and write "Attachment 14—Lawyer's Fees and Costs" for a title.

This is not a Court Order.

ATTACHMENT 7a(3) – Describe Harassment

ATTACHMENT 7a(3) – Describe Harassment

Description of most recent incident of harassment

Background

Respondent Kelly Gibbons is an individual who I have never met, but with whom I only “texted” with for a few weeks in January 2022 after which I rightly suspected that Gibbons was “catfishing” me i.e. Gibbons did not look like her pictures in real life and I simply rejected Gibbons and then moved on with my life peacefully. Gibbons, however, has since been caught having been obsessed with me and having conspired to harm me in the most egregious and threatening ways since I rejected her in early 2022 until today (i.e. well over two years), even inciting death-threats against me within the last month. Although I am currently suing Gibbons for defamation and other causes of action in the currently pending LASC case no. 23STCV14890 – and although I will be amending my complaint to add civil harassment, unjust enrichment and other causes against Gibbons and her co-conspirators such as Vanessa Valdes (see related and currently pending Restraining Order Case No. 24STRO03710 against Valdes), Elly Shariat, Liv Burger, et al. – I require this RO because of death threats said criminals are intentionally inciting against me.

Introduction

Most recently Gibbons along with Valdes has incited death threats against me by her severe online harassment. In particular, Gibbons has published false accusations of me on her GoFundMe webpage that she has promoted on local and international TV news media and elsewhere; and Gibbons has created online Facebook accounts impersonating and harassing me. I am just becoming aware of Gibbons’ above-noted crimes as I continue to develop evidence against her and Gibbons’ co-conspirators such as Valdes.

Death Threats Incited By Gibbons

Recently I received evidence of accounts on Facebook unknown to me but that are making death threats against my person and all of which are all directly linked to Gibbons and her co-conspirators such as Valdes et al. For instance, one account recently stated: **“Dude [petitioner] should have been put 6ft under in the desert somewhere with some pepper on top already... this guy [...] needs to be deleted.”** (Exhibit 1, attached to this document). The above-noted death threat is directly linked to Gibbons and others including, but not limited to Valdes who have ALL been caught gang-stalking and cyberbullying me online (Exhibit 2, attached to this document). In fact Gibbons (and Valdes) has (have) been conspiring for years to harm petitioner as noted in the following document ATTACHMENT 7b “Previous Harassment”. But Gibbons has not only falsely accused petitioner of having legal papers served improperly to incite the above-noted death threats (Exhibit 1, attached to this document). Gibbons’ and her co-conspirators such as Valdes have committed further crimes as discussed below:

Gibbons and her co-conspirators’ Fraudulent and Harassing GoFundMe Webpage Directed At Petitioner With Clown Symbols

ATTACHMENT 7a(3) – Describe Harassment

millions of people (Exhibit 8, attached to this document), thus wilfully inciting serious harm and death threats against petitioner (Exhibits 1-2, attached to this document)

Gibbons' Harassing Facebook "Clown" Webpage Illegally Impersonating Petitioner

After "*doxing*" petitioner's private texts with degrading clown symbols Gibbons and her co-conspirators such as Valdes then created a **Facebook clown webpage** to further harass and illegally impersonate petitioner and wherein Valdes "*doxes*" petitioner's full legal name as a **Facebook "Clown" account** (Exhibit 6, attached to this document). Here Gibbons continues her campaign to incite millions to make death threats against my person and god knows what else.

Both Gibbons' clown Facebook webpage and her fraudulent GoFundMe webpage with countless clown symbols are still active and thus still causing the above-noted harm and death threats to petitioner.

3d Like

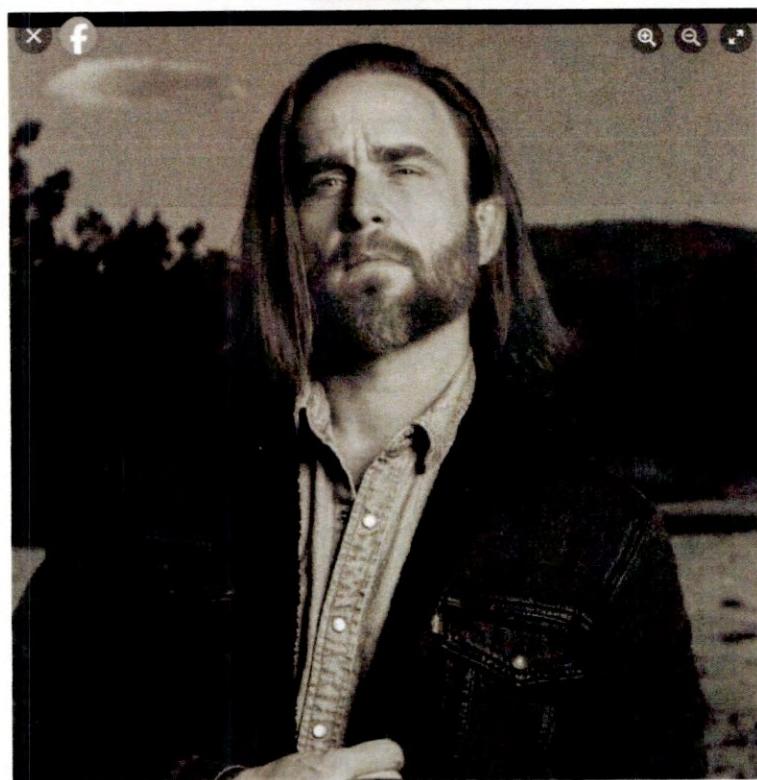


Mark DeLisle

OC Police dude showed up to serve her. She's never even met him in person and he knew where she lived and showed up personally.

Dude should have been put 6ft under in the desert somewhere with some pepper on top already.

Kcg Gib I only know you through Michele but I read the article last night... insane. I'd say this guy should be in a mental institution but he's past that, he needs to be deleted.



Exh. 2: Evidence of Kelly Gibbons conspiring with Vanessa Valdes et al. to incite death threats. Defendant Gibbons is currently being sued by petitioner Dr. Murrey for defamation and several other causes (civil equivalents to crimes of gang-stalking and cyberbullying) in LASC case no. 23STCV14890. Evidence below shows respondent Gibbons conspiring with Valdes et al. to incite death threats against petitioner. In particular, they falsely state that petitioner was stalking Gibbons when in truth all he did was properly accompany someone properly serving Gibbons said lawsuit. As evidence below makes clear – and further explained in petitioner's Attachment 7b "Previous Harassment", Gibbons has been conspiring with Valdes in secret to harm petitioner on Facebook and elsewhere for years.

4:18 4G

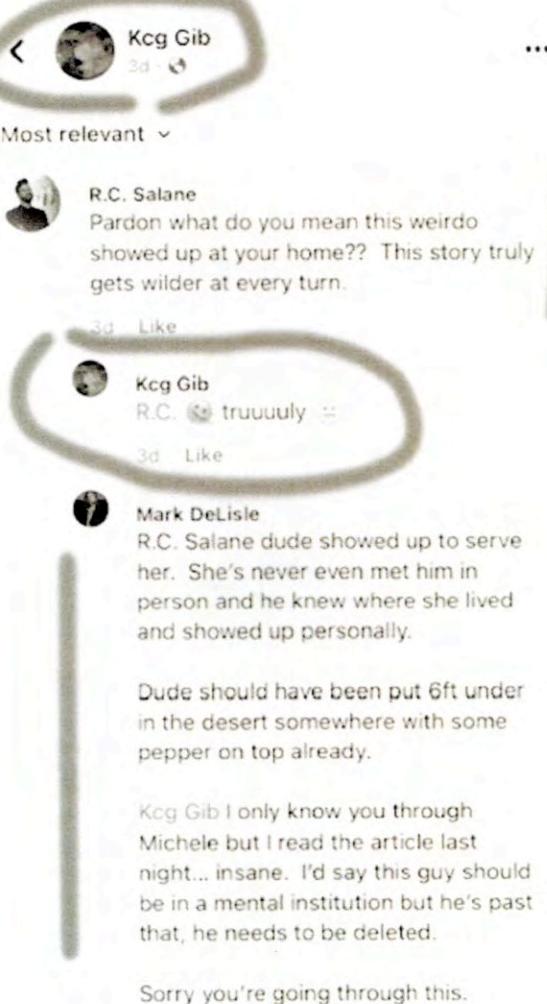


EXHIBIT 3

9

Thank you for reading, donating and sharing, **we appreciate every bit of support!** Please stay safe out there!

Sincerely,

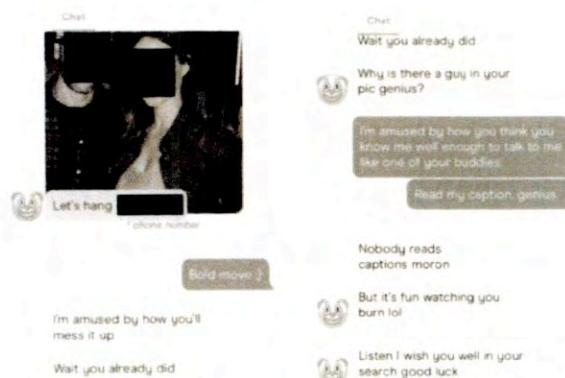
Vanessa Valdes, Olivia Burger, Kelly Gibbons, Amy Blalock, Elly Shariat, and Kelyn Rodriguez.

Matched with him on Tinder a few years back. He wanted to meet up IMMEDIATELY but I made it clear I couldn't because I had a client in town, also let him know my texts/replies wouldn't be timely because I'd be with my client and didn't want to be rude. He found my Instagram and even though I hadn't geo-tagged where in Beverly Hills I was, I guess he recognized the pool and at some point in the evening stopped by the hotel and sat down next to me and my client at the bar exclaiming "I've been looking for you all over town! You're a hard girl to pin down!" I was flabbergasted.

a hard girl to pin down?" I was flabbergasted and freaking out because who tf does that?! To show up uninvited at a place I didn't tell you about? Luckily a British guy a few seats over heard everything and pretended like he knew me and my client, apologized for having a call that ran long, and said why don't w... See more

Ok More Reply

to 111



A collage of various social media posts and a photo of a person's legs. The posts include:

- "Wait you already did" (with a search icon)
- "mess it up" (with a thumbs down icon)
- "I'm amused by how you'll" (with a thumbs up icon)
- "What you already did" (with a search icon)
- "Listen! Wish you well in your" (with a thumbs up icon)
- "Search good luck" (with a search icon)
- "Let's fun watching you" (with a thumbs up icon)
- "I'm lol" (with a thumbs up icon)
- "It's fun watching you" (with a thumbs up icon)
- "Noboddy reads captions moron" (with a thumbs up icon)
- "Read my caption genius" (with a thumbs up icon)
- "We are one of your buddies" (with a thumbs up icon)
- "I'm am amazed by how you think you're well enough to talk to me" (with a thumbs up icon)
- "Why is there a guy in your pic Genius?" (with a thumbs up icon)
- "Wait you already did" (with a search icon)
- "Chira" (with a thumbs up icon)

A small photo of a person's legs is overlaid on the bottom right.

EXHIBIT 4

15

Case Number: 23STCV14890 **Hearing Date:** May 29, 2024 **Dept:** 61
STEWART LUCAS MURREY vs KELLY GIBBONS, et al.

TENTATIVE

Defendant Elmira Shariat's Motion to Quash Service of Summons is GRANTED. Moving party to provide notice.

Defendant Amy Blalock's Special Motion to Strike (Anti-SLAPP) the First Amended Complaint is GRANTED as to the third, fourth, and sixth through eleventh causes of action, and DENIED as to the first, second, and fifth causes of action for defamation and false light. Moving party to provide notice.

Defendant Michal Ofek's Special Motion to Strike (Anti-SLAPP) the First Amended Complaint is GRANTED. Moving party to provide notice.

DISCUSSION

MOTION TO QUASH SERVICE OF SUMMONS

Code of Civil Procedure section 418.10, subd. (a)(1) states: "A defendant, on or before the last day of his or her time to plead or within any further time that the court may for good cause allow, may serve and file a notice of motion for one or more of the following purposes . . . (1) To quash service of summons on the ground of lack of jurisdiction of the court over him or her."

"[C]ompliance with the statutory procedures for service of process is essential to establish personal jurisdiction." (Ellard v. Conway (2001) 94 Cal.App.4th 540, 544.) Mere notice of litigation does not confer personal jurisdiction absent substantial compliance with the statutory requirements for service of summons. (MJS Enterprises, Inc. v. Superior Court (1984) 153 Cal.App.3d 555, 557.)

While courts are not required to accept self-serving evidence — such as declarations that one was not served — submitted to support a motion to quash, facial defects of the proof of service will rebut its presumption of proper service. (American Exp. Centurion Bank, *supra*, 199 Cal.App.4th at p. 390.) The burden is on a plaintiff to prove facts showing that service was effective. (Summers v. McClanahan (2006) 140 Cal.App.4th 403, 413.)

Defendant Elly Shariat (Shariat) moves to quash service of summons upon her on the grounds that the purported personal service made against her was not actually made. Although a proof of service filed on December 27, 2023, states that she was personally served on December 22, 2023, at 6:24 p.m., at an address on South Palm Canyon Drive in Palm Springs, Shariat

X

evening of service, and further that she is not the occupant of the unit in question. (Shariat Decl. ¶¶ 4–5, Exh. C. Plaintiff argues in opposition that Shariat is falsifying evidence and perjuring herself in an effort to evade this court's jurisdiction. Plaintiff, however, presents no evidence on this point. It is more likely that Plaintiff simply has the wrong address.

The motion to quash is GRANTED.

SPECIAL MOTIONS TO STRIKE

In 1992 the Legislature enacted Code of Civil Procedure section 425.16 as a remedy for the “disturbing increase in lawsuits brought primarily to chill the valid exercise of the constitutional rights of freedom of speech and petition for the redress of grievances.” (Code Civ. Proc., §425.16, subd. (a); Wilcox v. Superior Court (1994) 27 Cal.App.4th 809, 817.) The lawsuits are commonly referred to as “SLAPP” lawsuits, an acronym for “strategic lawsuit against public participation.” (Equilon Enterprises, LLC v. Consumer Cause, Inc. (2002) 29 Cal.4th 53, 57, fn. 1.) A defendant opposing a SLAPP claim may bring an “anti-SLAPP” special motion to strike any cause of action “arising from any act of that person in furtherance of the person's right of petition or free speech under the United States Constitution or the California Constitution in connection with a public issue” (Code Civ. Proc., § 425.16, subd. (b)(1).) An anti-SLAPP motion may be addressed to individual causes of action and need not be directed to the complaint as a whole. (Shekhter v. Financial Indemnity Co. (2001) 89 Cal.app.4th 141, 150.)

In ruling on an anti-SLAPP motion, a trial court uses a “summary-judgment-like procedure at any early stage of the litigation.” (Varian Medical Systems, Inc. v. Delfino (2005) 35 Cal.4th 180, 192.) This is a two-step process. First, the defendants must show that the acts of which the plaintiff complains were taken “in furtherance of the [defendant]'s right of petition or free speech under the United States of California Constitution in connection with a public issue.” (Code Civ. Proc., §425.16 subd. (b)(1).) Next, if the defendant carries that burden, the burden shift to the plaintiff to demonstrate a probability of prevailing on the claim. (Code Civ. Proc., § 425.16 subd. (b)(3).)

In making both determinations the trial court considers “the pleadings, and supporting and opposing affidavits stating the facts upon which the liability or defense is based.” (Code Civ. Proc., § 425.16, subd. (b)(2); Equilon Enterprises, supra, 29 Cal.4th at p. 67.)

A. PROTECTED ACTIVITY

following statements made by Defendant Blalock on the Facebook group in question, in reference to Plaintiff:

Back in 2017, I matched with him and before we went on a date my coworker was like – you better look him up. So I did, saw that he is likely a sociopath. So naturally, I went on a date with him. [laughing emoji] secretly it was so I could record him bc my life needs more drama.

I have a work phone and a personal phone. I put them stacked on the bar in front of me and one of them was recording. About 5 minutes into sitting there, he grabbed both of my phones and was like ‘let me see these’ and I was like OH SHIT, I’m caught but luckily I got the phones away from him. Like who does that?

Anyway, after like one drink, he’s asked me to join him at his friend’s house. Which I declined. It’s weird how he tries to get you to leave a place with him.

(Murrey Decl. Exh. 12.)

A comment responding to Blalock’s story said, “NEVER GO TO THE SECOND LOCATION! Lol.” (Ibid.) Blalock responded:

what happens at the second location???? I’m afraid if there’s any missing women in LA – he has something to do with it. The weird part is – he knows all this info is out there about him. Why does he stay in LA / Lake Arrowhead?!

(Ibid.)

In another statement, evidently made in regards to a proposed documentary about Plaintiff, Blalock stated:

We could all share our stories on the documentary like The Tinder Swindler.

Then again, I think this would boost his ego more.

Can’t win with that guy.

(Murrey Decl. Exh. 13.)

In another comment, in response to a chain of comments advising people not to date Plaintiff, Blalock also stated:

No no no no no. Read the other post with comments. Went out with him. He’s going to end up on Dateline one day. Not sure why he stays in LA – so many women know he’s a sociopath. I also know he uses fake profiles to access sites like this that talk about him. He’s so narcissistic.

small neighborhood of homeowners and characterized as “a mouthpiece for a small group of homeowners who generally would not permit contrary viewpoints to be published in the newsletter” has likewise been held to be a public forum. (Damon v. Ocean Hills Journalism Club (2000) 85 Cal.App.4th 468, 476.) A federal court applying this precedent ruled that even a private Facebook group of 14,900 members could constitute a public forum under the anti-SLAPP statute. (Hicks v. Bradford (C.D. Cal., Dec. 13, 2022, No. CV217330DMGGJSX) 2022 WL 20689541, at *4.) Thus the statements at issue here were made in a public forum.

The evidence and pleadings also establish that Valdes’s posts involved a matter of public interest: women’s security against male violence and harassment. Plaintiff’s allegations disclose as much. He states that these and other Facebook groups “allegedly exist to protect women.” (FAC ¶ 59.) In his original Complaint, he found fault with Defendants “postur[ing] about protecting women” in their posts. (Complaint ¶ 30.) He contended that the posters “aggressively promote themselves . . . as champions and protectors of women.” (Complaint ¶ 31.) . . . Although Plaintiff contends that these representations are insincere, this alleged insincerity would not remove the subject of discussion from the public interest. Courts have held comments made on a “Ripoff Report Web site” about a business owner’s “character and business practices,” concerned a public interest under the anti-SLAPP statute. (Chaker, *supra*, 209 Cal.App.4th at p. 1146.) Valdes’ comments about Plaintiff’s harassing conduct, on a forum directed to warning women against men who engage in such conduct, concerned at least as great a public interest.
(4/9/2024 Ruling.)

Plaintiff claims that his only allegations against Ofek stem from her role in the conspiracy against him, not from any statements she made on the Facebook group, and that he alleges no defamation claims against her. (Opposition at p. 6.) This is false, however, as all claims in the FAC are alleged against all Defendants, including Ofek, and none of them arises from any claimed instance of video recording.

Thus the present case against Defendants arises from protected activity within the meaning of the anti-SLAPP statute.

B. LIKELIHOOD OF PREVAILING

to place that person in reasonable fear for his or her safety, or the safety of his or her immediate family.” (Penal Code § 646.9, subd. (a).) Plaintiff also claims that Ofek’s actions amount to misappropriation of his likeness for a proposed documentary. (Opposition at pp. 9–10.)

These arguments are weak. The factual predicate for Ofek’s involvement in either of these activities is an instance in May 2023 in which Ofek and Defendant Kelly Gibbons filmed Plaintiff as he exited a hotel. (Murrey Decl. ¶ 19.)¹ This conduct forms no part of the allegations in Plaintiff’s pleadings, and is neither “repeated” nor a “credible threat” of violence within the stalking statute. (Penal Code § 646.9.) And although Plaintiff identifies discussions in the Facebook postings about a documentary, no such documentary or other film has actually been produced. Although Plaintiff claims that Gibbons shared Plaintiff’s private information, he presents no evidence to support that any such disclosure has occurred, let alone evidence that Ofek participated or conspired in its occurrence. (Opposition at pp. 11–12.)

Plaintiff has failed to establish the legal or factual sufficiency for any claim against Ofek, and the motion is therefore GRANTED in its entirety.

2. Blalock

Defamation “involves (a) a publication that is (b) false, (c) defamatory, and (d) unprivileged, and that (e) has a natural tendency to injure or that causes special damage.” (Price v. Operating Engineers Local Union No. 3 (2011) 195 Cal.App.4th 962, 970.) A false light claim based upon the same facts as a defamation claim “must meet the same requirements.” (Hawran v. Hixson (2012) 209 Cal.App.4th 256, 277.) “The sine qua non of recovery for defamation ... is the existence of falsehood.” [Citation.] Because the statement must contain a provable falsehood, courts distinguish between statements of fact and statements of opinion for purposes of defamation liability. Although statements of fact may be actionable as libel, statements of opinion are constitutionally protected.” (ZL Technologies, Inc. v. Does 1-7 (2017) 13 Cal.App.5th 603, 624.)

Plaintiff has presented evidence to show the legal and factual sufficiency of his first, second, and third causes of action for defamation and false light against Blalock. “[F]alse statements charging the commission of crime, or tending directly to injure a plaintiff in respect to his or her profession by imputing dishonesty or questionable

Facebook group is construed as a “business establishment” under Civil Code § 51, subd. (b), there is no evidence that Blalock had any role in denying him access to the group. Nor has Blalock engaged in “gender violence” against Plaintiff within the meaning of Civil Code § 52.4, as might support Plaintiff’s fourth cause of action. (See Civ. Code § 52.4, subd. (c) [defining “gender violence” to mean either a criminal offense that “has as an element the use, attempted use, or threatened use of physical force against the person or property of another” or “[a] physical intrusion or physical invasion of a sexual nature under coercive conditions”].)

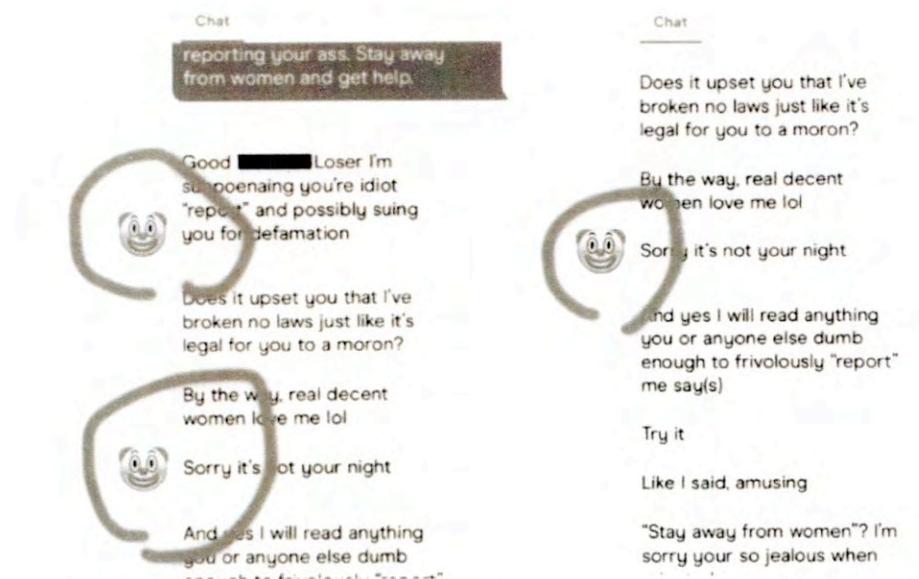
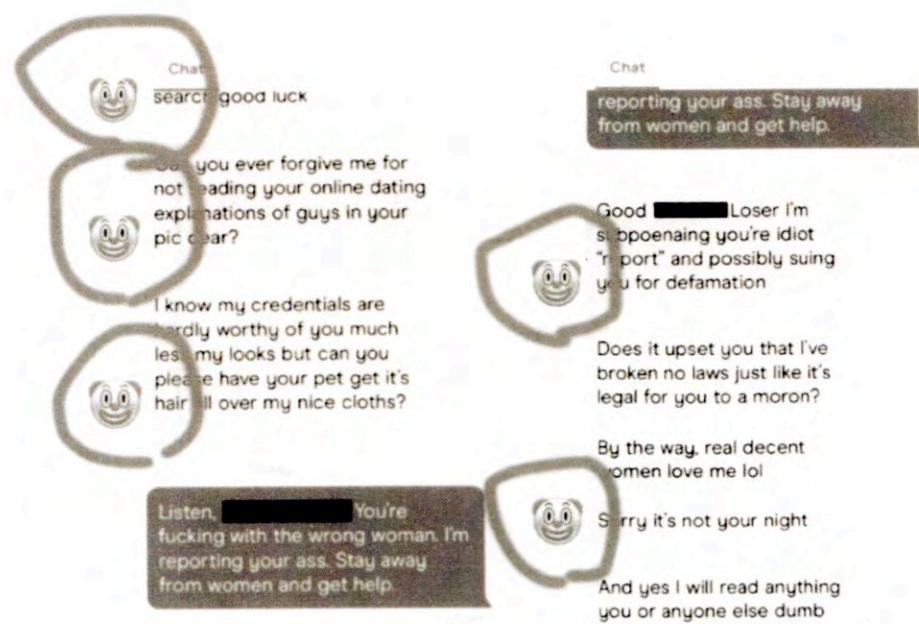
Nor is there any evidence that Blalock has intentionally or negligently interfered with Plaintiff’s economic relationships. “For intentional interference, the plaintiff must plead and prove: (1) an economic relationship between the plaintiff and some third party, with the probability of future economic benefit to the plaintiff; (2) the defendant’s knowledge of the relationship; (3) intentional acts on the part of the defendant designed to disrupt the relationship.” (Golden Eagle Land Investment, L.P. v. Rancho Santa Fe Assn. (2018) 19 Cal.App.5th 399, 429.) A claim for negligent interference is similar, but relies on a “defendant’s failure to act with reasonable care” rather than intentional acts. (See Nelson v. Tucker Ellis, LLP (2020) 48 Cal.App.5th 827, 844 fn. 5.) Here, Plaintiff has produced no evidence that Blalock had any knowledge of any of Plaintiff’s economic relationships, or that any such economic relationships were disrupted as a result of her conduct. Finally, Plaintiff has not attempted to establish the factual or legal sufficiency of his eleventh cause of action declaratory relief against Blalock. Nor can Plaintiff pursue an independent tenth cause of action for conspiracy, because “[c]ivil conspiracy is not an independent tort.” (City of Industry v. City of Fillmore (2011) 198 Cal.App.4th 191, 211.)

Accordingly, Blalock’s motion is GRANTED as to the third, fourth, and sixth through eleventh causes of action, and DENIED as to the first, second, and fifth causes of action for defamation and false light.

27



29





Stewart Lucas Murrey Clown

2 likes · 4 followers

[Message](#)

[Like](#)

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[Posts](#) · [About](#) · [Mentions](#) · [Reviews](#) · [Followers](#) · [Photos](#) · [More](#) · [...](#)

Intro

[Page](#) · Writing Service

Not yet rated (0 Reviews) [i](#)

Posts

[Filters](#)

[Stewart Lucas Murrey Clown](#)

April 12 at 7:18 AM [i](#)

This is one weird dude. Hopefully, she filed a restraining order against him or an order of

33

To wrap this up, it is our *opinion* that this Plaintiff poses a **legitimate danger** to the women of Los Angeles. Our negative interactions with him have spanned years. We plan to finally put an end to his harassing ways once and for all, and we need your help to do it.

We truly appreciate any and all help you're able to give. If you're unable to contribute financially, please consider sharing this fundraiser where you can.

Any contact with us can be made via the "contact" button at the bottom of this page.

- If you would like to reach out regarding **REPRESENTATION**, please include "*REPRESENTATION*" in the subject line.
- If you have any other pertinent **INFO** you'd like to share, please include "*INFO*" in the subject line.
- If you're reaching out as a member of the **MEDIA**, please include "*MEDIA*" in the subject line.

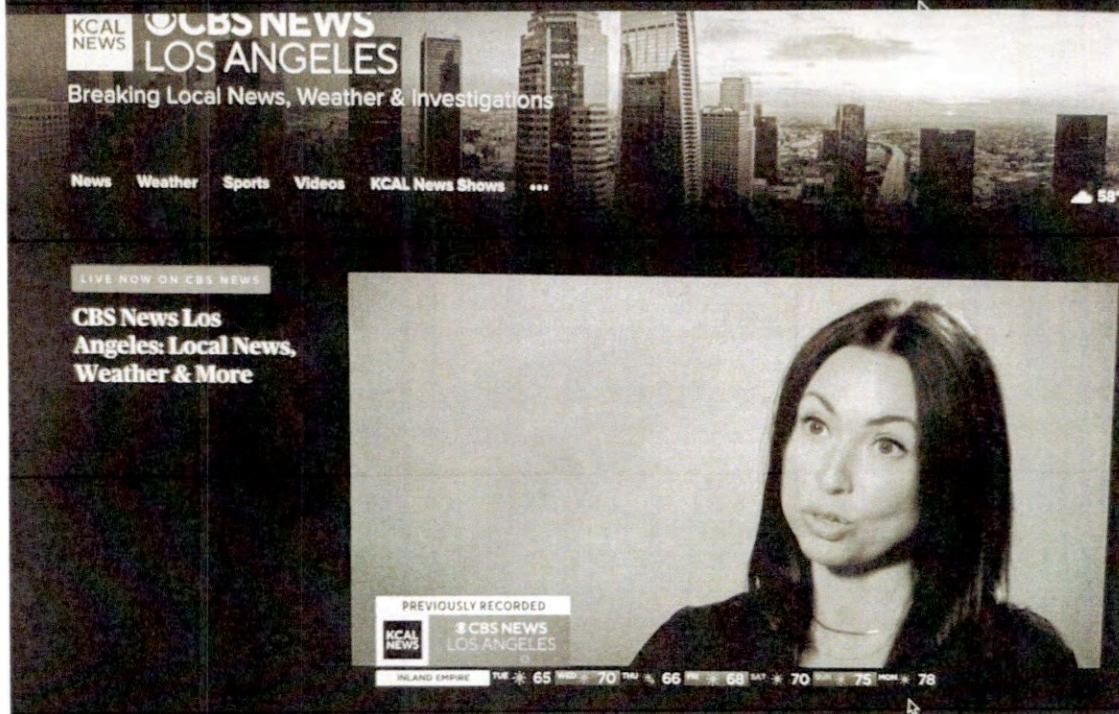
Thank you for reading, donating and sharing, **we appreciate every bit of support!** Please stay safe out there!

Sincerely,

Vanessa Valdes, Olivia Burger, Kelly Gibbons, Amy Blalock, Elly Shariat, and Kelyn Rodriguez.

Exh. 8: Page 1: Kelly Gibbons at Press Conference Defendants called to harm Plaintiff; Page 2: Kelly Gibbons, Vanessa Valdes and Olivia Burger; Pages 3-4-5: Valdes, Burger; and Gibbons at various national and international news outlets that they instigated





39



41

ATTACHMENT 7b – Previous Harassment

like Gibbons, Valdes et al. to harm him and get away with it, even if petitioner has empathy for those who are mentally unwell. In fact, Gibbons, Valdes and Burger even conspire to harm men who have passed away and families and even children of married men who refuse to have one-night stands with them (Exhibit 13, attached to this document). This same despicably savage and dangerous behavior is seen when Gibbons, Valdes, Burger et al. openly conspire to entrap and harm petitioner. For example, whereas Gibbons states that their secret conspiracy to harm petitioner should “**plant seeds of speculation**” to get people to think that petitioner is guilty of murder and other heinous crimes (Exhibit 14, attached to this document). They state: “**we need to hire a decoy to nail his ass on some shit**” (Exhibit 15, attached to this document), and in spirit with the conspiracy of harmful fear-porn against petitioner they state that they are “**reporting [his] ass**” and therefore he has to be “**ARRESTED**” (Exhibit 16, attached to this document). Gibbons, Valdes, Burger et al. thus belong to an uneducated, unrefined, crass, psychotic and dangerous group of women. Gibbons further *doxxed* petitioner’s texts within said Facebook forum knowing that others had already *doxxed* him so any redactions later done they knew are meaningless and just an attempt to deceive anyone into thinking they are considerate (Exhibit 17, attached to this document). Although it is likely that Gibbons, Valdes, Burger et al. will also be unmasked for further crimes they committed anonymously against petitioner (Exhibit 18, attached to this document, petitioner’s on calendar motion for order authorizing limited third-party discovery, etc.) the evidence against Gibbons that petitioner has already diligently developed and presented herein, including Gibbons’ direct incitement of death threats against him, is sufficient for petitioner’s instant restraining order petition.

Because anonymous Facebook administrators denied petitioner his first amendment right to free speech and he was unable to join these Facebook groups to defend himself while he was being severely defamed and harm before millions of users online for years, petitioner filed LAPD police and FBI reports about Gibbons, Valdes, Burger et al. and all the other Facebook accounts participating in the above-noted secret gang-stalking and cyberbullying of his person on 19 June of 2023 and then filed the above-noted action against Gibbons, Valdes, Burger et al. (See LASC case no. 23STCV14890, Dr. Murrey v. Gibbons).

Finally, Gibbons is presently still conspiring with Valdes, Burger et al. This is why Gibbons’ most recent harassment as shown in Attachment 7a – “Most Recent Harassment” shows Gibbons waging her smear campaign in national and international news with Valdes, Burger et al. (Exhibit 8, Attachment 7a – “Most Recent Harassment”). Further, Gibbons, Valdes, Burger et al. are all together named authors and co-signatories of Gibbons’ fraudulent and harassing GoFundMe webpage whereupon Gibbons posted Shariat’s false defamatory story about petitioner and which remains online still today (Exhibits 3, 2, Attachment 7a – “Most Recent Harassment”). Because Gibbons hides most of her online and offline crimes and keeps her activities secret in online forums hidden from the general populace, in particular hidden from the victims of Gibbons’ online conspiracies, this is only a fraction of Gibbons’ real crimes. Nevertheless, it is clear that even the above-noted fraction of crimes by Gibbons that petitioner has diligently dragged into the light prove that Gibbons is intentionally inciting death threats against him and worse (Exhibit 1, Attachment 7a – “Most Recent Harassment”).

20 December 2016

Lucas Murrey, California | Cheater Report

<https://cheaterreport.com/lucas-murrey-california-2/>

Lucas Murrey total con artist. Lives in Los Angeles (all women he wants) (he 220k income).
Left at first as a great man in a difficult situation and is oh so

45

CASE INFORMATION

[Case Information](#) | [Register Of Actions](#) | [FUTURE HEARINGS](#) | [PARTY INFO](#)

Case Number: 19SMCV00935

DR. STEWART LUCAS MURREY VS CHEATERREPORT.COM, ET AL.

Filing Courthouse: Santa Monica Courthouse

Filing Date: 05/24/2019

Case Type: Defamation (slander/libel) (General Jurisdiction)

Status: Request for Dismissal - Before Trial not following ADR or more tha

[Click here to access document images for this case](#)

If this link fails, you may go to the [Case Document Images](#) site and search i

EXHIBIT 10

49

No worries! I'm still at the gym
I'll probably head to JQ around 4

Or 5 lol finishing up some
errands so just text me when
you're free I'll let you know
where I am lol

Cool I just realized I have a
writing deadline tonight so
probably Friday but I'll let you
know :-)

I'm just getting a little nervous
about meeting you for some
reason

What's your insta?
I'll dm you

Actually it's ok I'm not really
interested in this anymore you're
too erratic

Wow. Lol. Alright. That was
interesting.

No worries at all! This day and
I'm busier than I expected also

Ended up***

I'm not into dumb games

There's a chance you confused
communicative with erratic here
but that reply actually confirms
why I was probably feeling how I
did about linking up. I guess I'll

12:52

SOS

-kelly gibbons 40 5'5

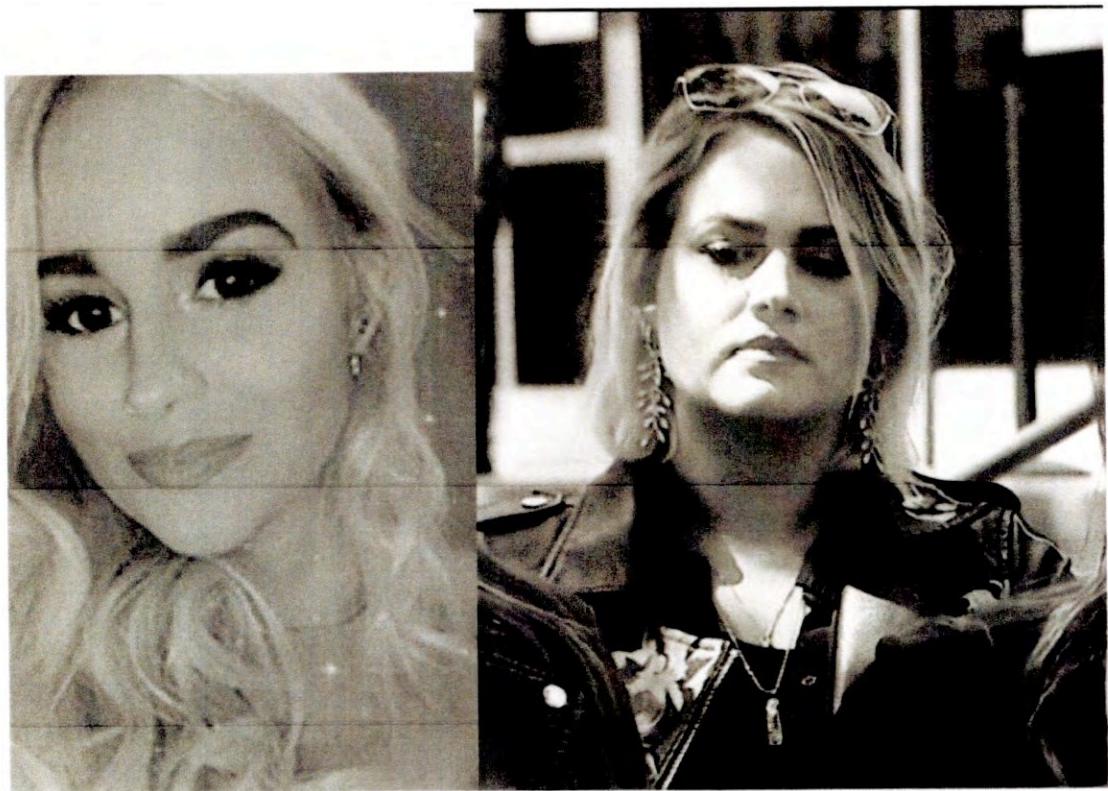
Good luck

You're def not communicative
but enjoy complimenting yourself
if others don't lol

I don't know what's dumb or
game-like about being open but
you turned rude really very
quickly. All good. No harm no
foul

I get plenty of compliments lol.
I'm not sure why your demeanor
has changed so drastically so
quickly. You're not into games
and I'm not into disrespect. So
it's good we didn't meet up 😊

I don't know why you have such
violent mood swings but if you
don't stop texting me I'll just
block you lol



53

Exh. 11: Gibbons' secret harassment and harm of petitioner for years on Facebook after he rejected her in early 2022. This is currently ongoing with Gibbons conspiring with Valdes, Burger et al. Gibbons' posts make no sense nor do any of the other posts as there is no evidence of any wrongdoing of petitioner.

Kel's Post

SUCCESSFUL.

Liv Burger
Be aware, he's still active on tinder. Just reported him

Like Reply 31w

Liv Burger
That reads "6'0 Yale scholar funny and nice."

Like Reply 23w

Vanessa Valdes
HOW HAS THIS GUY NOT BEEN REMOVED FROM DATING APPS AND ARRESTED ALREADY?!?!

I matched with him a couple years ago and received the most BIZARRE and threatening messages from him! It was so weird and scary that I even reported him to Hinge support, but never knew if anything was done about him. APPARENTLY NOT!! I'm so disgusted to see all these horrible testimonials about him, because it means he gets away with everything. He needs to be stopped!!
Pics in comments below...

Like Reply 9w

View 7 previous replies

Vanessa Valdes

55

Kel's Post

X

...about you that may be useful for us. We're always looking for ways to make our services better and more useful for you. We've got a few things planned for the future, so stay tuned! And if you have any questions or suggestions, feel free to leave a comment below.

Like · Reply



Lena Vanderford

Kel Culb Gib yes! "Fraudulent" meaning abusive murderer? 🤣

Like · Reply



Kel Culb Gib

Lena this was at the end of the email lol so I guess all his extortion lawsuits 🤣 they're gliding right on past that murder suspicion

* Fraudulent behavior includes but is not limited to using a false identity or posing a significant risk of attempting to obtain money from other users through deceitful means.

Like · Reply



Lena Vanderford

Kel Culb Gib I guess we should all be looking out for a fresh hinge profile

Like · Reply



Katherine Frame

Okay. So I googled and YIKES ON BIKES, here are the top google results:



57

11:44



Are We Dating The Same Guy? | ...
Los Angeles

Group member · Nov 9 · 2



Kel Culb Gib

OH MY GOD RUN. I posted him a few months ago and the info is ALARMING. There's a thread in here somewhere. I got him banned from Hinge but it was either lifted or he made a new one. PLEASE DO NOT GO OUT W THIS MAN.

3d Like Reply

3d



Lindsay Alexandra

Kel Culb Gib 2d

3d Like Reply



Amy Blalock

No no no no no. Read the other post with comments. Went out with him. He's going to end up on Dateline one day. Not sure why he stays in LA - so many women know he's a sociopath. I also know he uses fake profiles to access sites like this that talk about him. He's so narcissistic.

3d Like Reply

3d

Group member

Amy Blalock yeah I just went down the rabbit hole tonight and posted on OC group too and wow I've never seen so much shit on a group before this started



Write a comment...



Kel's Post

X



41

308 comments

Like

Comment

Send

Most recent ▾



Charlotte Hannah



This is dateline level bonkers!!!!

Like Reply 5h



Paige Cone



Like Reply 2h



The comment from Kel Culb Gib has been deleted

Kel Culb Gib Vanessa Valdes

Paige We believe you, hon! I'm so sorry that happened

Like Reply 1w



Kel Culb Gib Author

I've been down a rabbit hole since reading these comments and I found the summaries he has online for one of the books he has published. It's all about the works of a German poet with severe mental illness who lived in a tower for 26

61

Elly Shariat - I was matched with her on Tinder a few years back & IMMEDIATELY but I made it clear I couldn't bec.

All 9 1



Vanessa Valdes



Deirdra MacIntyre Cowen



Megan Cork



Jacqui Blue



Kel Culb Gib



Donna Dishbak



Liv Burger

Elly Shariat omg that's terrible!

7



Vanessa Valdes



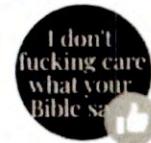
Kat Barre



Naomi Joy Garcia



Caitlin Brown



Tara Wujcik

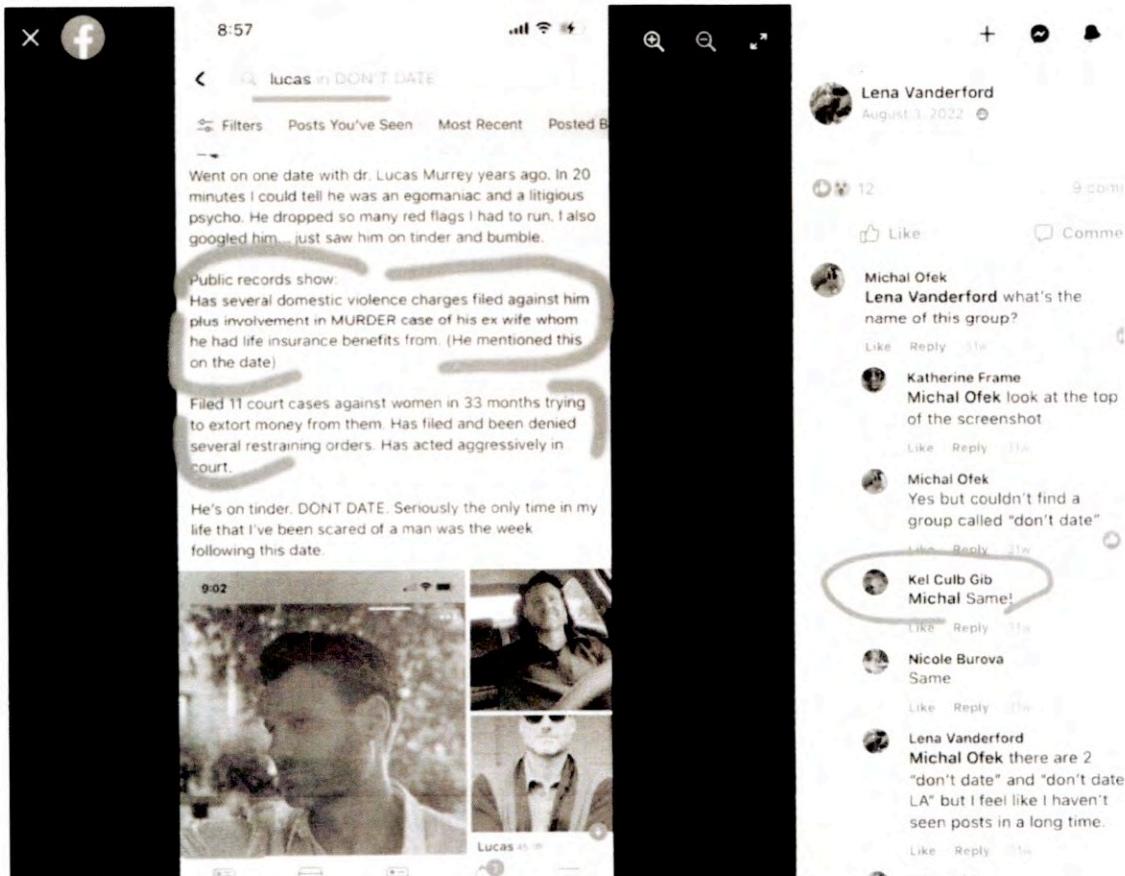


Donna Dishbak



Diane Leprince

Exh. 12: the severe gang-stalking, cyberbullying and defamation that Valdes conspired to promote and increase with her own comments in this same group and forum on Facebook. And which Valdes did for years after petitioner rejected her in 2019 and in which Valdes is still engaged today presently causing death threats against petitioner.



Group member Author

I'm so glad I posted here. I never met him yet so that was a close call! He said he was an Attorney on hinge but what's odd is today I got an email from hinge saying they banned a member named Luke for fraudulent behavior, but I had 2 Luke's I matched with, but after work I checked and he was gone and the other was still there so obviously it was him.

Like Reply 21w

 Lucy Crew

1 >
LuckyGSM

Kel's Post

One of your matches, Lucas M., was recently removed from Hinge based on information regarding potentially fraudulent* behavior. We are notifying you because you matched with this user. While Hinge cannot verify the accuracy of such information, it advises you to remain cautious in your online interactions with all individuals who you do not already know.

Like Reply 28w

Lena Vanderford

Kel Culb Gib yes! "Fraudulent" meaning abusive murderer? ☺

Like Reply 28w

Kel Culb Gib Author
Lena this was at the end of the email lol so I guess all his extortion lawsuits, they're gliding right on past that murder suspicion.

- * Fraudulent behavior includes but is not limited to using a false identity or posing a significant risk of attempting to obtain money from other users through deceitful means

Like Reply 28w

Lena Vanderford

Kel Culb Gib I guess we should all be looking out for a fresh hinge profile.

Like Reply 28w

四

Katherine Frame

Okay. So I googled and YIKES ON BIKES, here are the top google results:

69

EXHIBIT 13

H



Kel Culb Gib

My ex broke up with me because of my weight. He made comments throughout the relationship and I relapsed with disordered eating and had lost 20lb over 7 or 8 months when I walked in on him cheating with another girl. He ultimately told me he only cheated cause he's not used to dating women as "big" as I am and he wasn't physically attracted to me. That was 2 years ago and my disordered eating has gone the opposite way now, so I've gained 30 lbs and feel uncomfortable even trying to put myself out there to meet someone new.

This kind of thing really fucks with our self image. I hope she is okay 😔. And good on you for standing up for her and recognizing harmful behavior before it got too far.

Are We Slandered By the Same Girl? Or...



Are We Slandered By the Same Girl?
Orange County -Huntington Beach - Irvine

Follow

6d

Here they are Amir trying to gossip mill and keep you out of the dating pool.

"I didn't get good vibes"
Sounds like a high school locker room!

Gee, IDK Liv Burger, maybe people change? We didn't get good vibes from your comments either.



Like



Comment



Send



Share



Are We Datin...

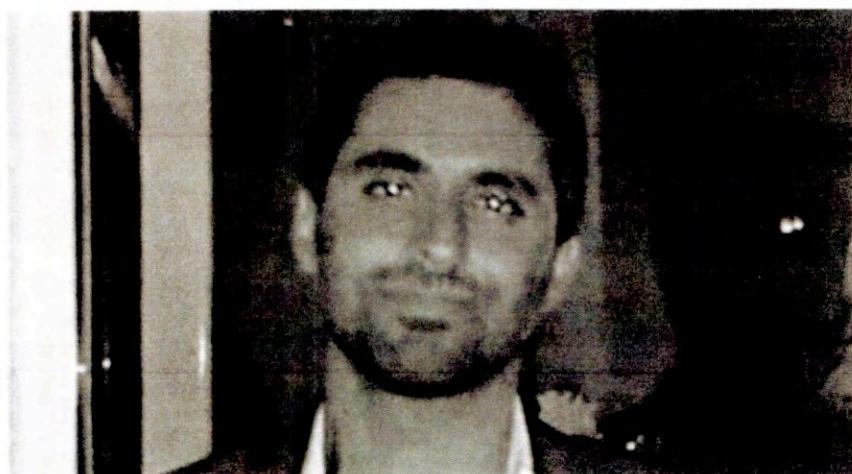


Anonymous member

1h



Has anyone matched with this guy?
He says his name is Amir from LA



Message Are We Slandered By the Same G...

75



Are We Dating The Same Guy? | Los Angeles

...

Kel Culb Gib · 4d · 88



Lea Stuff

This is not okay stop gossiping about this dead man

3d Like Reply

5



Kel Culb Gib

Lea to be fair I had no idea he had passed when I made the post. Just to be clear, it's okay to gossip about men who are alive and not able to see the page or defend anything but not ones who unknowingly passed?

3d Like Reply

7



Kel Culb Gib

Lea this page is supposed to be a safe space to call out men who have been disrespectful. That's what he did. Him dying doesn't change his behavior in life.

3d Like Reply

20



Miriam Jackson

Kel Culb Gib I'm with you

1d Like Reply

1



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Vanessa Valdes and Olivia Berger are among the defendants in the defamation and privacy case brought by



81

EXHIBIT 14

83



Kel Culb Gib

Author Open to messaging

Actually just screenshot the pictures themselves, don't mention the group or show the group name at all.

1d Like Reply

9:40



Are We Dating The Same Guy? | ...
Los Angeles

Kel Culb Gib Nov 14



Abby Meininger

I'm a documentary filmmaker! Let's do it

Like Reply



Jacqui Blue

Me too! I'll help! A documentary about
dating and dating apps alone would
be great.

Like Reply



Kel Culb Gib

Jacqui I can screen shot the
message I sent these girls to give
you an idea of what I was thinking

Like Reply



Jacqui Blue

Kel Culb Gib Yes, DM me.

Like Reply



Kel Culb Gib

Jacqui Blue it might go to your
requests (which I forgot to check
REGULARLY lol just fyi) if you
don't see it in main

Like Reply



Write a comment...



b8

[Like](#) [Reply](#)

Kel Culb Gib Author

This guy clearly has an affinity for lawsuits, ladies, so let's just not even mention this post. Don't even tell your diaries.

[Like](#) [Reply](#) 35w

Nicole Burova

Looks harmless and this is probably a paradigm example of looks being



Liv Burger

Stephanie Basey for real. we
need to hire a decoy to nail his
ass on some shit lol I was so mad
at myself for not recording our
conversation because it was that
bizarre

13h Like Reply

2

I know my credentials are hardly worthy of you much less my looks but can you please have your pet get it's hair all over my nice cloths?

Sent

Today, 12:29 AM

Listen, Lucas Murrey. You're fucking with the wrong woman. I'm reporting your ass. Stay away from women and get help.



Send a message

Send

Kel's Post

X

successful.

Like Reply 31w



Liv Burger

Be aware, he's still active on tinder. Just reported him

Like Reply 23w

0 6

View 1 more reply



Liv Burger

That reads "6'0 Yale scholar funny and nice." 😊

Like Reply 23w

View 4 Replies



Vanessa Valdes

HOW HAS THIS GUY NOT BEEN REMOVED FROM DATING APPS AND ARRESTED ALREADY?!?!

I matched with him a couple years ago and received the most BIZARRE and threatening messages from him! It was so weird and scary that I even reported him to Hinge support, but never knew if anything was done about him. APPARENTLY NOT!! I'm so disgusted to see all these horrible testimonials about him, because it means he gets away with everything. He needs to be stopped!! Pics in comments below...

Like Reply 9w

View 7 previous replies



Vanessa Valdes

10/16

Lucas

Like Reply 35w



Lena Vanderford Kel Culb Gib FOUND HIM

8:57 · 10 · lucas · DONT DATE

Filters · Posts You've Seen · Most Recent · Posted 8

Went on one date with dr. Lucas Murray years ago. In 20 minutes I could tell he was an egomaniac and a litigious psycho. He dropped so many red flags I had to run. I also googled him... just saw him on tinder and bumble.

Public records show:
Has several domestic violence charges filed against him plus involvement in MURDER case of his ex wife whom he had life insurance benefits from. (He mentioned this on the date)

Filed 11 court cases against women in 33 months trying to extort money from them. Has filed and been denied several restraining orders. Has acted aggressively in court.

He's on tinder. DONT DATE. Seriously the only time in my life that I've been scared of a man was the week following this date.



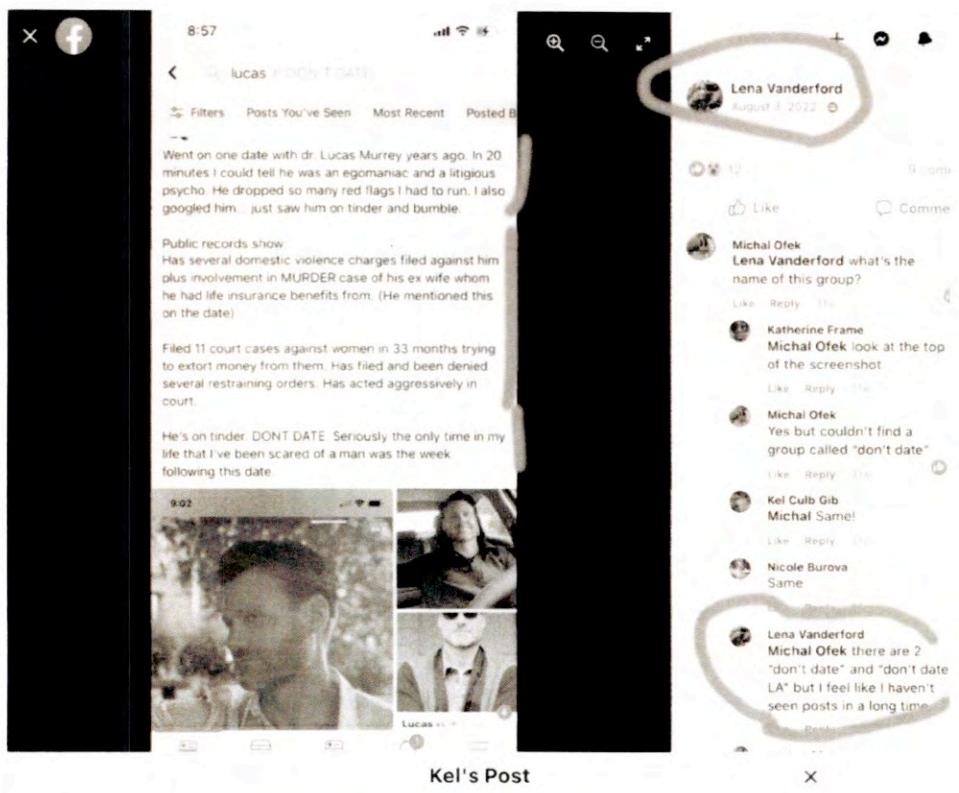
Like Reply 35w



Katherine Frame



94



Kel's Post

money. His Twitter is full of Bitcoin garb and conspiracies.

Like Reply 0 0 Edited

Diane Leprince

Kel Culb Gib I bet if we do some researches he doesn't have a phd. He maybe attended the program but never finished it....
I saw his twitter ...this guy is L O S T ! Big time. Thanks God your intuition protected you...

Like Reply 0 0

Kel Culb Gib Author

Diane he also told me he was 41 but he's 48. Not a huge stretch but still a lie.

Like Reply 0 0



Michal Ofek

Lena Vanderford what's the name of this group?

Like Reply 0 0

6 Replies

Clarissa Cash

96

EXHIBIT 18

98

1 several further defendants responsible for the unusually harmful online gang-stalking, harassment,
2 cyberbullying and defamation that plaintiff suffered remain unknown to him. To identify and serve
3 said unknown defendants this court must first grant this motion so that Dr. Murrey is authorized to
4 serve subpoenas on non-party websites, platforms, apps, internet service providers and/or other
5 persons to obtain defendants' identifying information. The reasons supporting this motion are more
6 fully explained in the memorandum below. The court's timely attention and ruling on this matter is
7 requested.

8
9 Dated: 21 May 2024

10 Respectfully submitted by,
11

12 /s/ Stewart Lucas Murrey
13 Dr. Stewart Lucas Murrey
14 Plaintiff & Plaintiff in Pro Per
15 1217 Wilshire Blvd. # 3655
16 Santa Monica, CA 90403
17 Tel.: (424) 278-3017
Email: 2@lucasmurrey.io
Website: lucasmurrey.com
SocialMedia: sickoscoop.com/lucas

18 **MEMORANDUM OF POINTS AND AUTHORITIES**

19 **I. STATEMENT OF FACTS**

20 In late 2022 and 2023 plaintiff began obtaining evidence of an online conspiracy to gang-
21 stalk, cyberbully and severely defame him (Declaration of plaintiff Dr. Stewart Lucas Murrey, ¶ 4).
22 This occurred on, but is not limited to Facebook forums such as "Are We Dating The Same Guy"
23 ("AWDTSG") (Ibid.). After assessing that there were more than 238 Facebook accounts involved,
24 plaintiff reported the severe electronic harassment to the LAPD and FBI in June 2023 prior to filing
25 this action (Ibid.). Although there are countless examples, two of the participants defendants Kelly
26 Gibbons and Liv Burger show how aggressively this group attacked plaintiff and also hid itself so the
27
28

[they] can all write a book about it and dedicate it to him. Some of us can dress like CIA agents and get him spooked.. or wear shirts with picture of his ex who was killed." (Decl. Dr. Murrey, ¶¶ 12-13, Exh. "4", emphasis added) Here anonymous Facebook accounts are presumably referring to plaintiff's girlfriend who passed from cancer in 2018 (Ibid.). Said accounts also accuse plaintiff of having committed countless "crimes" and they openly conspire with defendants such as Burger to stalk, harass, dox, and entrap plaintiff by force in secret (Decl. Dr. Murrey, ¶¶ 14-15, Exh. "5"). They say: "we should go undercover and get him to confess his crimes!" (Ibid.) Finally, said anonymous Facebook accounts accuse plaintiff of having claimed that he is an attorney and they state that he had been banned from the dating application Hinge for "fraudulent behavior", both statements of which are false (Decl. Dr. Murrey, ¶¶ 16-17, Exh. "6").

Category 3: Lena Vanderford aka Lena Bina

Another defendant whose true identity and location plaintiff has been unable to ascertain is Lena Vanderford aka Lena Bina. Vanderford states that plaintiff is an "abusive murderer" and that he has been caught acting "[f]raudulent" (Decl. Dr. Murrey, ¶¶ 18-19, Exh. "7"). Vanderford posted and reposed severe defamation concerning allegations of murder, extortion, domestic violence, etc. all of which are false and she aggressively "doxxed" and invaded the privacy of plaintiff's personal life (Decl. Dr. Murrey, ¶¶ 20-21, Exh. "8"). Vanderford further stated that plaintiff "is truly dangerous" and incited and participated in a conspiracy to gang-stalk, harass, defame, cyberbully and "cancel" plaintiff from any online platforms (Decl. Dr. Murrey, ¶¶ 22-23, Exh. "9"). Although it is unclear if Vanderford is a real person or a fake account with multiple names and fake stories to elude facial recognition, she appears on multiple platforms such as Facebook, Instagram, GoFundMe, LinkedIn and Wiza (Decl. Dr. Murrey, ¶¶ 24-25, Exh. "10").

Category 4: Kelyn Rodriguez aka Kelyn Rodriguez McLaughlin

1 Jeffrey Epstein/Ghislaine Maxwell pedophilia conspiracy (Decl. Dr. Murrey, ¶¶ 34-35, Exh. "16").
2 Because Frame seeks to deny plaintiff his right of free speech when he reasonably criticizes Israeli
3 state violence and national security state agencies Frame conspires with others to state that plaintiff's
4 Ph.D from Yale University is fraudulent and that he is mentally ill (Ibid.). Frame further conspires to
5 disseminate the most severe defamation of plaintiff: murder, extortion, domestic violence, etc. to
6 millions of Facebook users (Decl. Dr. Murrey, ¶¶ 36-37, Exh. "17"). And Frame conspires to harass
7 plaintiff for his criticism of the surveillance state that violates our most basic constitutional rights of
8 privacy everyday, in particular in regard to "tech wearables" (Ibid.). Finally, Frame shows an unusual
9 obsession with her participation in and support of the general conspiracy to harm plaintiff (Ibid.). As
10 expected, Frame's own Facebook account is suspicious and likely fake (Decl. Dr. Murrey, ¶ 38, Exh.
11 "18") and therefore plaintiff needs to unmask the true identity(ies) responsible for this account.
12

13 **Category 7: Wendy Wang**

14 Another defendant plaintiff does not know, never met, never spoke with, much less have any
15 recollection of is Wendy Wang. Wang aggressively participates in gang-stalking, harassing, defaming
16 and cyberbullying plaintiff, including, but not limited to Wang's republication of the worst
17 defamation that includes accusations of murder, extortion, domestic violence etc. (Decl. Dr. Murrey,
18 ¶¶ 39-40, Exh. "19"). Wang's Facebook account is suspicious (Decl. Dr. Murrey, ¶ 41, Exh. "20")
19 and plaintiff needs to unmask the true identity responsible for this account.
20

21 **Category 8: Anonymous Group Member Responsible for GoFundMe Webpage**

22 Another defendant is "anonymous defendant" responsible for unjustly enriching him or
23 herself with other defendants by creating a GoFundMe webpage whereupon false accusations of
24 stalking, physical harm and danger were stated about plaintiff while said defendants received
25 thousands of dollars (Decl. Dr. Murrey, ¶¶ 42-43, Exh. "21")
26

1 **Category 13: Anonymous AWDTSG Admins/Moderators Who Refused to Allow**
2 **Plaintiff to Join AWDTSG**

3 Anonymous Facebook group admins and/or mods unlawfully denied plaintiff his first
4 amendment right to free speech by refusing to allow him to join these groups to defend himself (Decl.
5 Dr. Murrey, ¶¶ 50-51, Exh. "25"). Because said anonymous admins and/or mods were fully aware of
6 the severe harm being caused to plaintiff, they themselves are guilty neglect and participating in the
7 above-noted conspiracy to severely harm plaintiff.

8 **Category 14: Any and all AWDTSG Admins/Moderators as they are all jointly and**
9 **severally responsible for the harm suffered by plaintiff**

10 All Facebook group admins and mods are jointly and severally responsible for any and all
11 crimes and/or civil torts committed by its members. Because plaintiff cannot join these groups he
12 needs information concerning all the admins and mods of all the Facebook groups wherein he was
13 mentioned and harmed.

14 **Category 15: Any and all creators of AWDTSG Facebook groups wherein plaintiff was**
15 **mentioned, including, but not limited to Paola Sanchez**

16 All creators of Facebook groups are jointly and severally responsible for any and all crimes
17 and/or civil torts committed by its members. Because plaintiff cannot join these groups and those
18 who created these groups are anonymous, he needs information concerning all the creators of all the
19 Facebook groups wherein he was mentioned and harmed, including, but not limited to Facebook user
20 Paola Sanchez (Decl. Dr. Murrey, ¶ 52, Exh. "26").

21 **Category 16: Any and all Facebook employees and/or personnel who participated in**
22 **and/or furthered the above-noted conspiracy to gang-stalk, defame and cyberbully plaintiff,**
23 **including, but not limited any and all censorship, "shadow-banning", etc. of plaintiff**

24 Facebook profits from the web-traffic generated from the harm to plaintiff and countless
25 others. Further, Facebook negligently and/or intentionally uses software that displays fraudulent
26 numbers of engagement with this conspiracy to harm plaintiff. For instance, although one defamatory

1 has satisfied the burden of a prima facie case for libel under California law. In this way plaintiff may
2 then obtain said critical information. Additionally, the data anticipated to be provided will likely also
3 include, but not be limited to IP addresses, which facilitates identification of the defendants, e.g. by
4 tying the IP address to defendant's ISP ("Internet Service Provider") account.

5 To further identify defendants plaintiff will also have to subpoena the ISPs for account
6 information connected to said IP addresses used to post, publish and circulate said defamation.
7 Authorization of this request by the court is necessary, as cable providing entities are subject to the
8 Cable Communications Privacy Act ("the Cable Act") and may only disclose their customer's
9 identifying information with the consent of their customers or pursuant to a court order. See 47
10 U.S.C. § 551 et seq.

11 In addition to plaintiff's request for an order to authorize discovery on Facebook and other
12 relevant online platforms/apps, Dr. Murrey also seeks orders from this court authorizing plaintiff to
13 subpoena ISPs identified through IP data provided by any and all third-parties. Because plaintiff is
14 not yet in possession of all relevant IP data, he is here seeking authorization to obtain IP data
15 subsequently provided by third-parties to prevent delay, conserve judicial resources and avoid
16 duplicative motion filings. Dr. Murrey will be required to return to the court and submit repetitive
17 requests for permission to serve each and every IP or ISP, as such information becomes available to
18 him, that will be based on the exact same facts and law in order to subpoena ISPs that are identified.
19 And because this can also be a time-sensitive issue, moving forward without delay is in the best
20 interest of this case, in particular given the unusually high number of defendants in this case. A
21 proposed order granting Dr. Murrey's requested relief that is specifically narrowly tailored to only the
22 purposes of this limited request is included in this motion and its concurrently filed pleadings.

23 **II. DR. MURREY'S MOTION TO AUTHORIZE DISCOVERY ON ENTITIES
24 OUTSIDE CALIFORNIA**

1 Further, Dr. Murrey filed this action in good faith given that defendants fraudulently conceal his/her
2 identities to anonymously author, publish and disseminate defamatory information about plaintiff on
3 Facebook and other similar online platforms. Accordingly, the court should grant Dr. Murrey's
4 requested relief.

5

6 **III. DR. MURREY'S MOTION TO AUTHORIZE DISCOVERY ON ISP(S) UNDER
THE CABLE PRIVACY ACT**

7

8 Third-party responses to Dr. Murrey's subpoenas will likely contain IP addresses tied to
9 defendants from when defendants created their defamatory publications on Facebook about plaintiff.
10 These IP addresses are tied to ISPs. Once Dr. Murrey receives this information, he will then be
11 required to request authorization from this court to obtain identifying information from said ISPs. The
12 court's authorization to obtain discovery from Facebook et al. as well as future identified ISPs from
13 IP addresses provided any other third-parties is required under the Communications Privacy Act, 47
14 U.S.C. § 551 et seq. (the "CPA").

15

16 Under the CPA, "a cable operator shall not disclose personally identifiable information
17 concerning any subscriber without the prior written or electronic consent of the subscriber concerned
18 and shall take such actions as are necessary to prevent unauthorized access to such information by a
19 person other than the subscriber or cable." 47 U.S.C. § 551(c)(1). However, courts routinely make
20 personally identifiable information available if the disclosure is, *inter alia*, "made pursuant to a court
21 order authorizing such disclosure, if the subscriber is notified of such order by the person whom the
22 order is directed." 47 U.S.C. § 551(c)(2)(B). See, e.g., *Fitch v. Doe*, 869 A.2d 722, 728 (Me. 2005)
23 (finding that 47 U.S.C. § 551(c)(2)(B) authorizes release of customer information pursuant to a court
24 order and prior notice in a civil action).

25

26 Courts have ordered disclosure of subscriber information when a plaintiff has no reasonable
27 means other than through the ISPs by which to identify the individuals allegedly involved absent such

1 information for the order he is requesting in this motion to move this case forward. He seeks any and
2 all relevant information such as basic subscriber information ("BSI") about the Facebook accounts
3 noted above and any and all related accounts on any and all related platforms.

4 And finally, as this Court is aware, defendants will all have an opportunity to file motions to
5 quash the unmasking of their identity, if they so choose, after Facebook and any other such entities
6 notifies them of the forthcoming subpoena process. In fact, this is the second time that plaintiff has
7 been forced to seek this order, the first of which was granted in a previously filed case (LASC case
8 no. 19SMCV00935) on 22 March 2022 (Decl. Dr. Murrey, ¶ 64, Exh. "51").

9
10 **IV. CONCLUSION**

11 For good cause shown, plaintiff Dr. Murrey requests that the court grant his motion to
12 authorize discovery on Facebook and any and all other related and relevant platforms/apps and
13 person(s) including, but not limited to all legacy social media companies and online dating apps, any
14 and all affiliated persons and any and all relevant Internet Service Providers by issuing an order
15 finding that Dr. Murrey has established a prima facie case of defamation and other causes against
16 defendants. Plaintiff further requests that this Court authorize discovery upon ISPs that will be
17 identified in the future in response to Dr. Murrey's discovery served on said third-parties.
18
19

20 Dated: 21 May 2024

21 Respectfully submitted by,

22
23 /s/ Stewart Lucas Murrey
24 Dr. Stewart Lucas Murrey
25 Plaintiff & Plaintiff in Pro Per
26 1217 Wilshire Blvd. # 3655
27 Santa Monica, CA 90403
28 Tel.: (424) 278-3017
Email: 2@lucasmurrey.io
Website: lucasmurrey.com
SocialMedia: sickoscoop.com/lucas



Make a Reservation

STEWART LUCAS MURREY vs KELLY GIBBONS, et al.

Case Number: 23STCV14890 Case Type: Civil Unlimited Category: Defamation (slander/libel)
Date Filed: 2023-06-27 Location: Stanley Mosk Courthouse - Department 61

Reservation

Case Name:	Case Number:
STEWART LUCAS MURREY vs KELLY GIBBONS, et al.	23STCV14890
Type:	Status:
Motion for Order (authorizing limited third-party discovery necessary to identify defendants)	RESERVED
Filing Party:	Location:
Stewart Lucas Murrey (Plaintiff)	Stanley Mosk Courthouse - Department 61
Date/Time:	Number of Motions:
07/08/2024 10:00 AM	1
Reservation ID:	Confirmation Code:
839705672747	CR-O9L526VXHKNQEV9DW

Fees

Description	Fee	Qty	Amount
Motion for Order (name extension)	0.00	1	0.00
TOTAL			\$0.00

Payment

Amount:	Type:
\$0.00	NOFEE
Account Number:	Authorization:
n/a	n/a

Payment Date:
1969-12-31

 [Print Receipt](#) [Reserve Another Hearing](#) [View My Reservations](#)

ATTACHMENT 16 – Additional Orders Requested

Gibbons must cease inciting death threats against Dr. Murrey.

Gibbons must remove and delete any and all Facebook accounts referring to Dr. Murrey other than his own personal Facebook account.

Gibbons must cease her participation in the above-noted conspiracy to harm Dr. Murrey.

Gibbons must never mention Dr. Murrey online again.

Gibbons must never participate in any secret online forums, including those that exclude any part of the populace from joining them, and especially not mention anyone who is unable to join said groups and thus unable to exercise his or her own first amendment right to freedom of speech to defend themselves.

All accounts that have harassed Dr. Murey linked to the conspiracy in which Gibbons has participated have to be shut down and deleted forthwith.

Any and all third-party accounts referring to Dr. Murrey that are not under his personal control and yet bear his likeness and/or impersonate him have to be shut down and deleted.

Gibbons may never again publish, promote nor refer to unverified stories about Dr. Murrey.

Gibbons must make a public statement that she intentionally failed to verify Shariat's harmful story of stalking because she maliciously sought to harm Dr. Murrey's reputation and promoted said harm.

Gibbons has to publically state that she has never met petitioner, that she has only texted with him intermittently in January 2022 after matching with him, and therefore Gibbons has no authority whatsoever regarding his real character and life.

Gibbons has to publicly state that she is in truth and actual fact was ignorant of the law and unaware of any actual evidence against petitioner.

Gibbons has to publicly state that she does not speak for all the women, much less all women of Los Angeles.

Gibbons has to cease seeking to entrap petitioner in her gross criminal plots e.g. with Valdes, Burger et al.

Gibbons has to cease any and all online and/or offline conspiracies to entrap anyone, petitioner included.

Gibbons has to stop lying that she dated petitioner, which she never did because he rejected Gibbons and unmatched her within a few weeks.

How Can I Respond to a Request for Civil Harassment Restraining Orders?

What is a civil harassment restraining order?

It is a court order that prohibits you from doing certain things and going to certain places.

What does the order do?

The court can order you to:

- Not contact the person who asked for the order
 - Stay away from that person and the person's home and workplace
 - Not have any guns as long as the order is in effect

Who can ask for a civil harassment restraining order?

A person who is worried about safety because he or she has been or is being:

- Stalked
 - Harassed
 - Assaulted, including sexually, or
 - Threatened with violence

I've been served with a request for civil harassment restraining orders. What do I do now?

Read the papers served on you very carefully. The *Notice of Court Hearing* tells you when to appear in court. There may also be a *Temporary Restraining Order* forbidding you from doing certain things. You must obey the order until the hearing.

What if I don't obey the order?

The police can arrest you. You can go to jail and pay a fine.

What if I don't agree with what the order says?

You still must obey the order until the hearing. If you disagree with the orders the person is asking for, fill out Form CH-120, *Response to Request for Civil Harassment Restraining Orders*, before your hearing date and file it with the court. If you need to include attachments, you can use Form MC-025. You can get the forms from legal publishers or on the Internet at www.courts.ca.gov. You also may be able to find them at your local courthouse or county law library.

Do I have to serve the other person with a copy of my response?

Yes. Have someone age 18 or older—not you—mail a copy of completed Form CH-120 to the person who asked for the order (or that person's lawyer). (This is called "service by mail.")

The person who serves the form by mail must fill out Form CH-250, *Proof of Service of Response by Mail*. Have the person who did the mailing sign the original. Take the completed form back to the court clerk or bring it with you to the hearing.

Should I go to the court hearing?

Yes. You should go to court on the date listed on Form CH-109, *Notice of Court Hearing*. If you do not go to the hearing, the judge can make orders against you without hearing from you.

CH-109	Notice of Court Hearing	<small>Check answer date when other form is filed</small>
① Person Seeking Protection		<small>Check answer date when other form is filed</small> Your Lawyer, if any, who will represent you: Name _____ State Bar No. _____ Firm Name _____ b. Your Address: If you have moved, give your present information. (You do not have a lawyer and want to keep your home address private, you may give a different mailing address instead. You do not have to give telephone, fax or email.) Address _____ City _____ State _____ Zip _____ Telephone _____ Fax _____ E-Mail Address _____
b. Your Address: If you have moved, give your present information. (You do not have a lawyer and want to keep your home address private, you may give a different mailing address instead. You do not have to give telephone, fax or email.) Address _____ City _____ State _____ Zip _____ Telephone _____ Fax _____ E-Mail Address _____		
② Person From Whom Protection Is Sought		Your Lawyer, if any, who will represent the person in this case: Name _____
<small>Please print clearly, type or use ink.</small>		
③ Notice of Hearing		
A court hearing is scheduled on the request for restraining orders against the person in ②. Name and address of court if different from above		
Hearing Date _____ Time _____ Date _____ Room _____		
④ Temporary Restraining Orders : The orders granted are in Form CH-109, served with this notice.		
a) Temporary Restraining Orders for personal conduct and stay-away orders as requested in Form CH-109 Request for Civil Harassment Restraining Orders are checked and are Not Checked.		
b) <input type="checkbox"/> All GRANTED until the court hearing		
c) <input type="checkbox"/> All DENIED until the court hearing. (Specify reasons for denial in <u> </u> below)		
d) <input type="checkbox"/> Party GRANTED and party DENIED until the court hearing. (Specify reasons for denial in <u> </u> below)		
<small>Printed, typed, or handwritten. Under California law, it is illegal to file a false affidavit. See California Civil Code section 11177.5.</small>		
Notice of Court Hearing (Civil Harassment Prevention)		CH-109, Page 1 of 1 →

How long does the order last?

If the court issued a temporary restraining order before the hearing, it will last until your hearing date. At that time, the court will decide to continue or cancel the order. Any order issued at the hearing can last for up to five years.

Do I need a lawyer?

Having a lawyer is always a good idea, but it is not required, and you are not entitled to a free court-appointed attorney. Ask the court clerk about free and low-cost legal services and self-help centers in your county.

Will I see the person who asked for the order at the court hearing?

Yes. Assume that the person who is asking for the order will attend the hearing. Do not talk to him or her unless the judge or that person's attorney says that you can.

Can I bring a witness to the court hearing?

Yes. You can bring witnesses or documents that support your case to the hearing. But if possible, you should also bring the witnesses' written statements of what they saw or heard. Their statements must be made under penalty of perjury. You can use Form MC-030 for this.

For help in your area, contact:

[Local information may be inserted.]

What if I don't speak English?

When you file your papers, ask the clerk if a court interpreter is available. You may have to pay a fee for the interpreter. If an interpreter is not available for your court date, bring someone to interpret for you. You should ask someone age 18 or older to interpret for you.

What if I have a gun?

If a restraining order is issued, you cannot own, possess, or have a gun, other firearm, or ammunition while the order is in effect. If you have a gun or other firearm in your immediate possession or control, you must sell it to or store it with a licensed gun dealer, or turn it in to a law enforcement agency.

Can I agree with the protected person to cancel the order?

No. Once the order is issued, only the judge can change or cancel it. You or the protected person would have to file a request with the court to cancel the order.

What if I am deaf or hard of hearing?

Assistive listening systems, computer-assisted real-time captioning, or sign language interpreter services are available if you ask at least five court days before the hearing. Contact the clerk's office or go to www.courts.ca.gov/forms for *Request for Accommodations by Persons with Disabilities and Response* (Form MC-410). (Civ. Code, § 54.8.)

Use this form to respond to the Request (form CH-100)

- Read *How Can I Respond to a Request for Civil Harassment Restraining Orders? (form CH-120-INFO)*, to protect your rights.
- Fill out this form and take it to the court clerk.
- Have someone age 18 or older—not you—serve the person in ① or his or her lawyer by mail with a copy of this form and any attached pages. (*Use form CH-250, Proof of Service of Response by Mail.*)

① Person Seeking Protection

Name of person seeking protection (see form CH-100, item ①): _____

Fill in court name and street address:

Superior Court of California, County of**Los Angeles Superior Court
Central District, Family Law
111 N. Hill Street, Room 426
Los Angeles, CA 90012****② Person From Whom Protection Is Sought**

a. Your Name: _____

Your Lawyer (if you have one for this case): _____

Name: _____ State Bar No.: _____

Firm Name: _____

b. Your Address (If you have a lawyer, give your lawyer's information.)

If you do not have a lawyer and want to keep your home address private, you may give a different mailing address instead. You do not have to give telephone, fax, or e-mail.):

Address: _____

City: _____ State: _____ Zip: _____

Telephone: _____ Fax: _____

E-Mail Address: _____

Court fills in case number when form is filed.

Case Number: _____

Present your response and any opposition at the hearing. Write your hearing date, time, and place from form CH-109 item ③ here:

Hearing Date → Date: _____ Time: _____
 Dept.: _____ Room: _____

If you were served with a Temporary Restraining Order, you must obey it until the hearing. At the hearing, the court may make orders against you that last for up to five years.

③ □ Personal Conduct Orders

- a. I agree to the orders requested.
- b. I do not agree to the orders requested.
- c. I agree to the following orders (specify): _____

④ □ Stay-Away Orders

- a. I agree to the orders requested.
- b. I do not agree to the orders requested.
- c. I agree to the following orders (specify): _____

⑤ □ Additional Protected Persons

- a. I agree that the persons listed in item ③ of form CH-100 may be protected by the order requested.
- b. I do not agree that the persons listed in item ③ of form CH-100 may be protected by the order requested.

6 Guns or Other Firearms and Ammunition

If you were served with form CH-110, *Temporary Restraining Order*, you cannot own or possess any guns, other firearms, or ammunition. (See item ⑦ of form CH-110.) You must sell to or store with a licensed gun dealer, or turn in to a law enforcement agency, any guns or other firearms in your immediate possession or control within 24 hours of being served with form CH-110. You must file a receipt with the court. You may use form CH-800, *Proof of Firearms Turned In, Sold or Stored*, for the receipt.

- a. I do not own or control any guns or firearms.
 - b. I have turned in my guns and firearms to the police or sold them to or stored them with a licensed gun dealer.

A copy of the receipt is attached. has already been filed with the court.

7 Possession and Protection of Animals

- a. I agree to the orders requested.
 - b. I do not agree to the orders requested.
 - c. I agree to the following orders (*specify*):

8 □ Other Orders

- a. I agree to the orders requested.
 - b. I do not agree to the orders requested.
 - c. I agree to the following orders (*specify*):

9 Denial

I did not do anything described in item (7) of form CH-100. (Skip to (10).)

10 Justification or Excuse

If I did some or all of the things that the person in ① has accused me of, my actions were justified or excused for the following reasons (*explain*):

- Check here if there is not enough space below for your answer. Put your complete answer on an attached sheet of paper and write "Attachment 10—Justification or Excuse" as a title. You may use form MC-025, Attachment.

11 **No Fee for Filing**

- a. I request that I not be required to pay the filing fee because the person in **1** claims in form CH-100 item **13** to be entitled to free filing.
- b. I request that I not be required to pay the filing fee because I am eligible for a fee waiver. (*Form FW-001, Request to Waive Court Fees, must be filed separately.*)

12 **Lawyer's Fees and Costs**

- a. I ask the court to order payment of my Lawyer's fees Court costs
The amounts requested are:

Item	Amount	Item	Amount
_____	\$ _____	_____	\$ _____
_____	\$ _____	_____	\$ _____
_____	\$ _____	_____	\$ _____

Check here if there are more items. Put the items and amounts on the attached sheet of paper or form MC-025 and write "Attachment 12—Lawyer's Fees and Costs" for a title.

- b. I ask the court to deny the request of the person asking for protection that I pay his or her lawyer's fees and costs.

13 Number of pages attached to this form, if any: _____

Date: _____

Lawyer's name (if any) _____

► Lawyer's signature _____

I declare under penalty of perjury under the laws of the State of California that the information above and on all attachments is true and correct.

Date: _____

Type or print your name _____

► Sign your name _____

1 What is a firearm?

A firearm is a:

- Handgun
- Rifle
- Shotgun
- Assault weapon

**2 If you own or have a firearm you must:**

- Turn it in to local law enforcement
- Sell it to a licensed firearms dealer, or
- Store it with a licensed firearms dealer

3 How do I sell or store my firearm?

Find a California licensed firearms dealer in your area.

Look under "Firearms Dealers" in your local Yellow Pages or on the Internet. Make sure the dealer is licensed.

4 How do I take my firearm to law enforcement?

Call your local law enforcement agency to ask about their procedures. Take a copy of the restraining order with you.

Go directly to the law enforcement agency. Do not go anywhere else with firearms in your vehicle!

5 If I turn my firearm in to law enforcement, how long will they keep it?

Ask the law enforcement agency.

6 After I give my firearm to law enforcement, can I change my mind?

Yes. You are allowed to make one sale through a licensed gun dealer. To do this, a licensed gun dealer must present a bill of sale to your local law enforcement agency. The law enforcement agency will give the licensed gun dealer the firearm you are selling.

DO

- * unload your firearm
- * put your firearm in the trunk
- * call ahead to the police department

DO NOT

- * bring a loaded firearm to the law enforcement agency.
- * bring ammunition with the firearm when you turn it in
- * put your firearm in a locked glove compartment
- * bring a firearm to court

7 Do I have to pay the law enforcement agency to keep my firearm?

You may have to pay the agency for keeping your firearm. Contact your local law enforcement agency and ask if a fee is charged. The agency will tell you how much you need to pay.

8 Questions?

Call your local law enforcement agency:
(insert local information here.)

CH-800**Proof of Firearms Turned In, Sold,
or Stored**

Clerk stamps date here when form is filed.

① Protected Person

Name: _____

② Restrained Person

a. Your Name: _____

Your Lawyer (if you have one for this case): _____

Name: _____ State Bar No.: _____

Firm Name: _____

b. Your Address (If you have a lawyer, give your lawyer's information.)

If you do not have a lawyer and want to keep your home address private, you may give a different mailing address instead. You do not have to give telephone, fax, or e-mail.:

Address: _____

City: _____ State: _____ Zip: _____

Telephone: _____ Fax: _____

E-Mail Address: _____

Fill in court name and street address:

**Superior Court of California, County of
Los Angeles Superior Court
Central District, Family Law
111 N. Hill Street, Room 426
Los Angeles, CA 90012**

Court fills in case number when form is filed.

Case Number: _____**③ To the Restrained Person:**

If the court has ordered you to turn in, sell, or store your firearms, you may use this form to prove to the court that you have obeyed its orders. When you deliver your unloaded weapons, ask the law enforcement officer or the licensed gun dealer to complete item ④ or ⑤ and item ⑥. After the form is signed, file it with the court clerk. Keep a copy for yourself. For help, read Form CH-800-INFO, *How Do I Turn in, Sell, or Store My Firearms?*

4**To Law Enforcement**

Fill out items ④ and ⑥ of this form. Keep a copy and give the original to the person who turned in the firearms.

The firearms listed in ⑥ were turned in on:

Date: _____ at: _____ a.m. p.m.

To: _____

Name and title of law enforcement agent

Name of law enforcement agency

Address

I declare under penalty of perjury under the laws of the State of California that the information above is true and correct.



Signature of law enforcement agent

5**To Licensed Gun Dealer**

Fill out items ⑤ and ⑥ of this form. Keep a copy and give the original to the person who sold you the firearms or stored them with you.

The firearms listed in ⑥ were

sold to me transferred to me for storage on:

Date: _____ at: _____ a.m. p.m.

To: _____

Name of licensed gun dealer

License number _____ Telephone _____

Address

I declare under penalty of perjury under the laws of the State of California that the information above is true and correct.



Signature of gun dealer

6 Firearms

<u>Make</u>	<u>Model</u>	<u>Serial Number</u>
-------------	--------------	----------------------

- a. _____
- b. _____
- c. _____
- d. _____
- e. _____

Check here if you turned in, sold, or stored more firearms. Attach a sheet of paper and write "CH-800, Item 6—Firearms Turned In, Sold, or Stored" for a title. Include make, model, and serial number of each firearm. You may use Form MC-025, Attachment.

7 Do you have, own, possess, or control any other firearms besides the firearms listed in **6**? Yes No

If you answered yes, have you turned in, sold, or stored those other firearms? Yes No

If yes, check one of the boxes below:

- a. I filed a *Proof of Firearms Turned In, Sold, or Stored* for those firearms with the court on (date): _____
- b. I am filing the proof for those firearms along with this proof.
- c. I have not yet filed the proof for the other firearms. (Explain why not): _____

Check here if there is not enough space below for your answer. Put your complete answer on the attached sheet of paper or Form MC-025 and write "Attachment 7c" for a title.

I declare under penalty of perjury under the laws of the State of California that the information above is true and correct.

Date:

Type or print your name

Sign your name

Clerk stamps date here when form is filed.

1 Person Seeking Protection

Name: _____

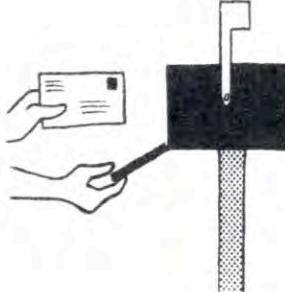
2 Person From Whom Protection Is Sought

Your Name: _____

3 Notice to Server

The server must:

- Be 18 years of age or older.
- Live or be employed in the county where the mailing took place.
- Not be listed in items ① or ③ of Form CH-100.
- Mail a copy of all documents checked in ④ to the person in ①.
- Complete and sign this form and give it to the person in ②.



Fill in court name and street address:

**Superior Court of California, County of
Los Angeles Superior Court
Central District, Family Law
111 N. Hill Street, Room 426
Los Angeles, CA 90012**

Fill in case number:

Case Number: _____**PROOF OF SERVICE BY MAIL**

4 I am 18 years of age or older and not a party to this proceeding. I live or am employed in the county where the mailing took place. I mailed the person in ① a copy of all documents checked below:

- a. Form CH-120, *Response to Request for Civil Harassment Restraining Orders*
- b. Other (specify): _____

5 I placed copies of the documents checked above in a sealed envelope and mailed them as described below:

a. Mailed to (name): _____

b. To this address: _____

City: _____ State: _____ Zip: _____

c. On (date): _____ Mailed from: City: _____ State: _____

6 Server's Information

Name: _____

Address: _____

City: _____ State: _____ Zip: _____

Telephone: _____

(If you are a registered process server):

County of registration: _____ Registration number: _____

I declare under penalty of perjury under the laws of the State of California that the information above is true and correct.

Date: _____

Type or print server's name

Server to sign here

SUPERIOR COURT OF CALIFORNIA COUNTY OF LOS ANGELES

INFORMATION - How To Safely Turn in Firearms, Firearm Parts, and Ammunition

If the court issues a restraining order against you, you cannot have firearms, firearm parts (any receiver, frame or unfinished receiver frame), and ammunition while the order is in place. You have 24 hours from the time you received the restraining or protective order to turn in or sell your firearms, firearm parts or ammunition and 48 hours to provide proof that you no longer have any firearms, firearm parts or ammunition. This is called "relinquishment." You cannot give your firearm, firearm parts, or ammunition to a friend, family member, or anyone else. If you do not relinquish these items, you can be charged with a crime for violating the restraining order; and there may be other consequences. The DV-800-INFO court form has information on this topic, including answers to the following questions:

1 What is a firearm / firearm part(s)?

A firearm and firearm part(s) are:

- Handgun • Shotgun
- Rifle • Assault Weapon
- Any receiver • Frame or unfinished receiver frame



2 If you own or have a firearm, you must:

- Turn it in to local law enforcement, or
- Sell it to, or store it with, a licensed gun dealer.

3 How do I sell my firearm?

Find a licensed gun dealer in your area.

Look under "Firearms Dealer" in your local Yellow Pages or on the Internet. Make sure the dealer is licensed.

If you choose to turn in your firearm and ammunition to a law enforcement agency, follow these steps:

1. Call the Los Angeles County Sheriff's Department or your local police department. Tell them you have a restraining order, which requires that you turn in your firearm(s), firearm parts (any receiver, frame or unfinished receiver frame), and ammunition.

To determine the location of your nearest police station or Sheriff's department, you can visit <https://lasd.org/stations/>.

Enter your address at the bottom of the screen and click "FIND MY STATION" to locate your nearest station to call.

2. The law enforcement agency will explain where and how to turn in your firearm(s), firearm parts (any receiver, frame or unfinished receiver frame), and ammunition. Follow their instructions carefully.

3. Law enforcement may ask for:
 - a description of you and your car,
 - your ID, and
 - A copy of your court order requiring relinquishment
4. Follow these safety instructions:
 - Your firearm(s) must be unloaded. If you do not know how to unload the firearm(s) safely, **inform your local law enforcement prior to relinquishing your firearm.**
 - If possible, place a flex tie or other obstruction to lock the chamber on a revolver or the slide on a semi-automatic weapon.
 - Place the firearm in your trunk and lock your trunk. If you do not have a trunk, place your firearm in a locked container and put it in the back of your vehicle out of arm's reach. A "locked container" does NOT include the glove compartment of a motor vehicle. (California Penal Code § 16850). Ammunition should be placed in a separate box or ammunition can.
 - Drive straight to the law enforcement agency. Do not stop anywhere else.
 - On your arrival, park your car and call the agency for further instructions. If you are unable to call, leave the firearm(s), firearm parts, and ammunition in your car and enter the station to ask for instructions. Make sure that your car is locked.
5. Do not bring any firearms into the building. Leave all firearms in their locked containers inside your vehicle until given further instructions by the law enforcement officers.
6. You will receive a receipt for documentation. You must file form CH/DV/EA/GV/SV-800 within 48 hours of the issue date of the order.
7. A local law enforcement agency may charge you a fee for the storage of a firearm or ammunition (California Family Code § 6389(e)).
8. If you decide to sell your firearm instead of turning it into law enforcement, you must use a licensed gun dealer as defined under California Penal Code § 26700 and file proof of the sale with the court within 48 hours of issuance of the restraining order.

YOU MUST ACT QUICKLY: You have 24 hours to relinquish your firearm(s), firearm parts, and ammunition.

This deadline applies during weekends and holidays. The Sheriff's office and police departments are available 24 hours, every day of the week.

FILE YOUR PROOF OF RELINQUISHMENT: You must file your proof of compliance with the court within 48 hours of relinquishment. You may use the CH/DV/EA/GV/SV-800 form for this purpose or file the documents provided by the law enforcement agency.



LACourt

Make your court appearances from home. From the office.

LACourtConnect is a new Court tool that allows people with court cases to appear for their hearings via audio or video, saving them a trip to the courthouse.

LACourtConnect is available for:

- Civil (including Collections, Small Claims and Unlawful Detainers);
- Family Law;
- Probate; and
- Traffic and Non-Traffic Infraction cases (trials excluded).

LACourtConnect provides detailed, non-technical instructions to guide users through the process. Scheduling an appearance is as easy as 1-2-3.

To get started:

1. Visit the Court's *Here For You | Safe For You* (<http://www.lacourt.org/newsmedia/ui/HfySfy.aspx>) webpage and select 'Appear for Your Hearing Remotely' in the 'For The Public' column.
2. Follow the instructions for creating a Court ID.
3. Schedule the remote appearance **at least two hours before the hearing**; you will receive an email with instructions for connecting to the hearing.

NOTE: Test your equipment before the day of the hearing to avoid problems. Directions for testing are in the Quick Reference Guide at this link:

<https://www.lacourt.org/documents/LACCQuickReference.pdf>

Non-refundable fees for using LACourtConnect are:

- \$15 for each audio appearance;
- \$23 for each video appearance; or
- **Free for individuals who have been granted fee waivers.**

For more information, including answers to Frequently Asked Questions, visit:

<https://www.lacourt.org/lacc/>



LACourt

Comparezca ante la corte desde su casa. Desde su oficina.

LACourtConnect permite que las personas con casos en la corte comparezcan para sus audiencias por video o videoconferencia desde su casa.

LACourtConnect está disponible para los siguientes asuntos:

- Civil (incluidos cobranzas, reclamos menores y desalojo).
- Derecho familiar.
- Testamentarios y
- Casos de infracción por tránsito y no tránsito (excepto juicios)

LACourtConnect proporciona instrucciones detalladas y sencillas para guiar a los usuarios durante el proceso. Puede programar una comparecencia en tres simples pasos:

para comenzar:

Visite la página web de la corte *Here's Your Safe For You* (Aqui para usted, seguro para usted) (<http://www.lacourt.org/newsmedia/ly/HfySfy.aspx>) y seleccione "Appear for Your Hearing Remotely" (Comparecer a su audiencia de manera remota) en la columna "For The Public" (Para el público). Siga las instrucciones para crear un usuario de identificación de la corte. Programe la comparecencia remota al menos **dos horas antes de la audiencia**. recibirá un correo electrónico con instrucciones para conectarse a la audiencia.

OTA pruebe su equipo antes del día de la audiencia para evitar problemas. Las instrucciones para hacer una prueba están en la guía de referencia rápida en este enlace:

<https://www.lacourt.org/documents/LACCQuickReference.pdf>

Las tarifas son de los sistemas platados de videoconferencia:

\$15 por cada comparecencia por audio.

\$25 por cada comparecencia por video.

Sin costo para personas a las que se les ha otorgado una exención de tarifas.

Para obtener más información sobre las tarifas y las preguntas más frecuentes, visite:

<https://www.lacourt.org/lacc/>

SAFE FOR YOU

Dr. Murrey v. Gibbons

ATTACHMENT 16 – Additional Orders Requested

Gibbons has to publicly state that she never dated petitioner, which she never did because he rejected Valdes and unmatched her a few weeks.

ATTACHMENT 16 – Additional Orders Requested

ATTACHMENT 16 – Additional Orders Requested

Kelly Gibbons must stop posting/publishing any and all further information that contains my personal information, including, but not limited to my home addresses, phone numbers, full legal name, email addresses, social media accounts, photos of my person or any and all other persons relating to me, as well as any and all false accusations about my character, actions, behaviors, legal rulings etc. This further includes any and all postings that one can infer reasonably refer to my person. Gibbons must refrain from soliciting any and all third parties to post any of the aforementioned information on her behalf. Further, Gibbons must also remove and completely delete any and all social media and other online posts stating the aforementioned information.

Furthermore:

Gibbons must immediately remove and complete delete her fraudulent GoFundMe account with Shariat's fictional story of staking that in truth and actual fact never occurred.

Gibbons must refrain from ever stating that Dr. Murrey is a danger to anyone, including the women of Los Angeles.

Gibbons must agree that only documents that are already publicly available via the public Court docket system and their listed documents may be published by Dr. Murrey.

Gibbons must agree that she must refrain from publishing any information about Dr. Murrey that she previously "doxxed" in Facebook online forums prior to any published court docket system.

Gibbons must never participate in Facebook's online forum "Are We Dating The Same Guy" again.

Gibbons is never allowed to post any criticisms of anyone without giving him or her notice of said postings.

Gibbons is never allowed to post any criticisms of anyone unless this person is made aware of Gibbons' criticisms and they have the ability to exercise his or her own freedom of speech and post responses to Gibbons' criticisms all of which need to be equally available to the public and/or users witnessing said online free use of speech.

Gibbons must never participate in any Facebook group and/or any other social media group ever again.

Gibbons must agree that Dr. Murrey can now exercise his first amendment right to freedom of speech to publicly address any and all issues raises in this restraining order petition, in particular to correct and alleviate the harmful statements and harassment that Gibbons made in said online Facebook forums in secret against him during the past half-decade.

PROOF OF SERVICE
STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the county of Los Angeles, State of California, I am over the age of 18 and not a party to this action. My business address is: 1217 Wilshire Blvd. # 3655, Santa Monica, CA 90403.

On 21 May 2024 I served the foregoing documents in the matter of Dr. Murrey v. Gibbons et al. (Case No. 23STCV14890) described as: Plaintiff's motion for order authorizing limited third-party discovery to identify and serve defendants, declaration and proposed order to:

Kelly Gibbons aka Kel Culb Gib aka kcg
2121 Crenshaw Blvd.
Los Angeles, CA 90016
Tel.: (803) 360-4816
Email: kelculbgib@gmail.com,
bkkelculbgib@gmail.com

Albert Hugh III
P.O. Box 751094
Las Vegas, Nevada 89136
Tel.: (323) 405-1229
Email: ajh37@cornell.edu
Attorney for Michal Ofek

Olivia (Liv) Burger
8110 W. 83rd St. # 1
Playa Del Rey, CA 90293
(231) 590-6751
Email: oliviaburger08@gmail.com

Elly (Elmira) Shariat
2160 S. Palm Canyon Dr. # 12
Palm Springs, CA 92264

And:
411 E. Huntington Dr. Ste. 107 #1223
Arcadia, CA 91006
Tel.: (310) 233-4522
Email: southbayjourney@gmail.com

By Mail: XXX.

_____. I deposited such envelopes in the mail at Los Angeles, California, 90036, the envelope was mailed with first class postage thereon, fully prepaid.

_____, I am readily familiar with this firm's practice for collecting and processing correspondence for mailing. Under that practice the above described documents would be deposited in the US Mail on that same day with postage thereon, first class, fully prepaid, in the ordinary course of business. I am aware that on motion of the party affected that service is presumed invalid if the postage meter date or postmark is more than one day after the date stated for deposit in the mail thereon.

By Personal Delivery, Handing a copy to: _____, I caused to be delivered the above described documents, by hand to the address shown above on the date stated herein.

By Fax Transmission: _____, I caused above described documents to be sent by Facsimile transmission to the following Attorneys/Parties at the following FAX Telephone numbers: _____.

By Email: XXX.

I declare under penalty of perjury, under the laws of the State of California that the foregoing is true and correct.

Executed on 21 May 2024

By: /s/ Alexander J. Petale
Alexander J. Petale, Esq.

113

1 an order. See *Malibu Media, LLC v. Doe*, 2016 U.S. Dist. LEXIS 141447 (S.D. Cal. Oct. 12, 2016)
2 (order issued for plaintiff to obtain the name and address of the subscriber associated with the IP
3 address from the ISP in order to identify and serve John Doe defendant); *Rotten Records, Inc. v. Doe*,
4 2016 U.S. Dist. LEXIS 132222 (W.D.N.Y. Sept. 27, 2016) (court issued order for plaintiff to serve a
5 subpoena on Doe's ISP to ascertain Doe's name and address for the purpose of identifying Doe in the
6 litigation, and to then serve the summons and complaint on Doe); *QOTD Film Inv. Ltd. v. Does*, 2016
7 U.S. Dist. LEXIS 60994 (D. Nev. May 5, 2016) (good cause shown for issuance of order for ISP to
8 provide plaintiff with the true name and address of the defendant to whom the IP address belongs to
9 lead to information that would make service of process possible).

10
11 Dr. Murrey filed this action in good faith given that defendants have aggressively conspired
12 against him and to hide their conspiracy to gang-stalk, cyberbully and severely defame him. As noted
13 above, defendants have fraudulently concealed his/her identities to anonymously author, publish and
14 disseminate defamatory information about plaintiff on numerous Internet application forums. The
15 identifying information sought from ISPs is directly and materially related to Dr. Murrey's claims.
16 Without knowing defendants' identities plaintiff is unable to pursue the relief sought in this lawsuit.
17 Given the foregoing, the court should grant this motion forthwith because Dr. Murrey has no more
18 effective means to discover or obtain the identities of defendants and, moreover, there is a material
19 risk that the ISPs data retention policies will cause the deletion of responsive information, also
20 because defendants involved in this action may well be a part of the infrastructure of said data
21 collection agencies.

22
23 In every lawsuit a distressed plaintiff has the right to confront the individuals who assaulted
24 him or her, especially in a case wherein defendants harmed plaintiff specifically so that he could
25 never identify them and defend himself. Further, plaintiff has diligently obtained the necessary
26
27

1 Similar to California law, most state laws understand defendants' identifying information as
2 privileged under the First Amendment. *Yelp Inc. v. Superior Court*, 17 Cal. App. 5th 1 13, 2017 Cal.
3 App. LEXIS 995 (2017), citing *ZL Technologies, Inc. v. Does 1-7*, 13 Cal. App. 5th 603, 2017 Cal.
4 App. LEXIS 629, (2017); *Thomson v. Jane Doe*, 189 Wn. App. 45, 356 P.3d 727, 2015 Wash. App.
5 LEXIS 1434, 43 Media L. Rep. 1997; *See also Ritz Grand Casino v. John Doe*, Montgomery C.P.
6 No. 2014CV02077 (August 27, 2014) and *SPXCorp. v. Doe*, 253 F. Supp. 2d 974 (2003).

7 In order for plaintiff to be able to obtain this information he must first obtain a court order
8 showing he has made a prima facie showing on his claim for libel against defendants (*Krinsky v. Doe*
9 6, 159 Cal App. 1154, 1171-72 (2008). *Yelp, Inc, Supra, and Glassdoor, Inc. v. Superior Court*, 9
10 Cal. App. 5th 623, 2017 Cal. App. LEXIS 213 (2017); *Thomson, supra*4 (“to reveal the identity of an
11 anonymous speaker, prima facie evidence sufficient to satisfy the applicable standard of proof on the
12 defamation claim is required before the anonymous speaker may be unmasked.”)).
13

14 Along with said analogous case law, it is clear that the general state law practice is such that
15 all states tend to require at least a minimal evaluation of plaintiff's complaint e.g. in regard to a trial
16 court's decision to entertain a motion to dismiss and hold in abeyance any other ruling. Dr. Murrey
17 has met this burden and requests this court issue the attached orders authorizing discovery. To prove
18 a case for libel in California, it must be shown that a statement was 1) false; 2) regarding the plaintiff;
19 3) published without privilege; 4) with fault of at least negligence; 5) and caused special harm to the
20 plaintiff.

21 Defendants' online publications contain allegations that knowingly falsely accuse plaintiff of
22 countless serious crimes and having various loathsome diseases and lacking any and all credibility in
23 his professions, including, but not limited to serial killing, murder, domestic violence, fraud, being a
24 vexatious litigator, having STDs, etc. These allegations are false and constitute libel per se. Id.
25

comment about plaintiff will allegedly have "45" responses, when one actually looks at the number of accounts that responded the real number is only a fraction of the number displayed (Decl. Dr. Murrey, ¶ 53, Exh. "27"). The reason for this is clear. By portraying a grossly inaccurate number that is much higher than what is in truth and actual fact occurring in reality, Facebook creates group-think to influence and control its real-life users. And because they are unknown to plaintiff, he needs any and all identifying information concerning any and all Facebook employees and/or personnel who oversaw the above-noted AWDTSG Facebook groups and the Facebook software they use.

The only means for plaintiff to discover the true identities of the above-noted defendants is for Dr. Murrey to subpoena Facebook and other entities relevant to this case. Thus to move this case forward with efficacy, plaintiff needs to find out, for instance, the basic subscriber information ("BSI"), any and all reports about plaintiff made by defendants to Facebook and to any other similar entities relevant to this case as well as any and all forms of consequential censorship, banning, etc. that plaintiff suffered as a result of said reports. This includes defendants' names, email addresses, Internet Protocol ("IP") addresses, telephone numbers, financial information and/or any other identifying information, including said reports, that can be reasonably provided and that will potentially help identify defendants. This data is necessary and the only means for plaintiff to discovery the true identities of defendants and properly serve them with the summons of this action.

Because said cyberbullying is often hidden behind fake accounts to elude justice, Dr. Murrey will also have to subpoena third-parties who and/or which have relevant identifying information about defendants. This includes, but not limited to online dating apps like Tinder, Bumble, Hinge, other legacy social media like Instagram, Twitter, etc., many of which are located outside of California. Thus plaintiff needs obtain an order from this court showing that he has a prima facie claim for relief to be able to obtain this information i.e. an order from this court finding that plaintiff

1 **Category 9: Anonymous Facebook User(s) Responsible for Harassing Facebook Account**
2 **Impersonating Plaintiff**

3 Another defendant is the anonymous creator of a harassing Facebook account illegally using
4 plaintiff's name and images and impersonating plaintiff's likeness (Decl. Dr. Murrey, ¶¶ 44-45, Exh.
5 "22")

6 **Category 10: Mark DeLisle**

7 Another defendant: Mark DeLisle is someone who plaintiff does not know, has never met,
8 much less spoken to, but who has openly made death threats against plaintiff's life on Facebook in
9 response to defendant Kelly Gibbons' misrepresentations of facts concerning this case (Decl. Dr.
10 Murrey, ¶¶ 46-47, Exh. "23")

12 **Category 11: Anonymous AWDTSG Admins/Moderators Who Approved Any and All**
13 **Gang-Stalking, Harassing, Defaming and Cyberbullying Posts**

14 All of the above-noted gang-stalking, harassing, defaming and cyberbullying comments were
15 approved by AWDTSG Facebook administrators ("admins") and/or moderators ("mods") (Decl. Dr.
16 Murrey, ¶¶ 48-49, Exh. "24"). Because they knowingly facilitated and thus participated in this
17 severely harmful conspiracy, these anonymous individuals must also be identified and served this
18 lawsuit.

20 **Category 12: Anonymous AWDTSG Admins/Moderators Responsible for Rules of**
21 **Safety and Conduct**

22 All of the above-noted gang-stalking, harassing, defaming and cyberbullying comments
23 occurred within Facebook groups who, along with Facebook itself, proclaims in their terms of service
24 and rules of safety and conduct that no such behavior would be tolerated and/or allowed. Because the
25 persons responsible were fully aware that this was occurring for years they thus knowingly facilitated
26 and participated in this severely harmful conspiracy and these anonymous individuals must also be
27 identified and served this lawsuit.

1 Another defendant plaintiff does not know, never met, never spoke with, much less have any
2 recollection of is Kelyn Rodriguez aka Kelyn McLaughlin. Rodriguez falsely accuses plaintiff of
3 being labeled a vexatious litigant (Decl. Dr. Murrey, ¶¶ 26-27, Exh. "11"). She states: "He's
4 [plaintiff] has been label a vexatious litigator – he's on the ca courts listing". (Ibid.) This statement is
5 false (Decl. Dr. Murrey, ¶¶ 28-29, Exh. "12"). Plaintiff has never been labeled a vexatious litigant,
6 nor has he ever been on California's listing of such litigants, as shown in the records from 2023 and
7 2024 wherein plaintiff's name does not appear (Ibid.) Evidence also shows Rodriguez aggressively
8 participating in the above-noted gang-stalking and cyberbullying of plaintiff (Decl. Dr. Murrey, ¶ 30,
9 Exh. "13"). Plaintiff has no idea who Rodriguez is nor why she is also obsessed with him and
10 harming him; and although she has several social media profiles, plaintiff is unable to locate her
11 whereabouts (Decl. Dr. Murrey, ¶¶ 28-30, Exh. "13").
12

14 **Category 5: Ainka Wiz**

15 Another defendant plaintiff does not know, never met, never spoke with, much less have any
16 recollection of is Ainka Wiz. Wiz falsely accuses plaintiff of murder, being a murder suspect, having
17 sexually transmitted diseases ("STDs") and goes on to state that even if all of this is not true plaintiff
18 somehow deserves to be defamed and harmed (Decl. Dr. Murrey, ¶¶ 31-32, Exh. "14"). Wiz'
19 Facebook account(s) are suspicious and likely fake (Decl. Dr. Murrey, ¶ 33, Exh. "15") and therefore
20 plaintiff needs to unmask the true identity(ies) responsible for this account.
21

22 **Category 6: Katherine Frame**

23 Another defendant plaintiff does not know, never met, never spoke with, much less have any
24 recollection of is Kathrine Frame. Frame steals copyrighted articles plaintiff published on his
25 personal website wherein plaintiff reasonably criticizes Israeli and United States "intelligence"
26 agencies and their historically proven ties to blackmail operations, including, but not limited to the
27
28

1 crimes and civil torts of its participants would never come to light. Said defendants instruct the
2 members of this conspiracy how to create false stories about plaintiff and how to hide this groups'
3 existence (Decl. Dr. Murrey, ¶¶ 5-6, Exh. "1") The harm was unusually severe, including, but not
4 limited to accusations of murder, extortion, fraud, domestic violence, having STDs, having a
5 fraudulent credentials e.g. a fraudulent Ph.D, etc. and defendants communicated said harmful remarks
6 to millions of Facebook users as well as on countless other platforms (Ibid.).
7

8 **Category 1: Anonymous Facebook account(s)**

9 One anonymous Facebook defendant and/or group of unknown Facebook defendants
10 defamed plaintiff by posting statements wherein he, she and/or they accuse plaintiff of committing
11 murder, extortion, domestic violence and other such serious crimes. In particular, he, she and/or they
12 state that plaintiff has had "several domestic violence charges filed against him", that he was in
13 "involve[d] in [the] MURDER of his ex[-]wife" and that he "tr[ies] to extort money from them
14 [women]" (Decl. Dr. Murrey, ¶¶ 7-8, Exh. "2"). All of these statements are false and plaintiff has
15 never been charged, much less convicted of any crimes his entire life (Decl. Dr. Murrey, ¶ 9)
16

17 **Category 2: Further Anonymous Facebook account(s)**

18 Another anonymous Facebook defendant aka "Anonymous [Facebook] Group Member"
19 created a post on 9 November 2022 about plaintiff which may further include other anonymous
20 Facebook defendants (Decl. Dr. Murrey, ¶¶ 10-11, Exh. "3"). Said anonymous defendant(s)
21 conspired with named defendants such as Liv Burger to stalk, dox, harass and defame plaintiff and
22 unjustly enrich themselves from said crimes and civil torts. In response to Burger's conspiracy to
23 stalk and harass plaintiff at his previously familiar places where, per Burger's defamation, plaintiff
24 "defrauds countless women", anonymous Facebook member(s) respond(s) by saying that he, she
25 and/or they are willing to aggressively participate in this criminal conspiracy and after which "we
26
27
28

1 Dr. Stewart Lucas Murrey
2 1217 Wilshire Blvd. # 3655
3 Santa Monica, CA 90403
4 Tel.: (424) 278-3017
5 Email: 2@lucasmurrey.io
6 Website: lucasmurrey.com
7 SocialMedia: sickoscoop.com/lucas

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Superior Court of California,
County of Los Angeles
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David W. Slayton,
Executive Officer/Clerk of Court,
By P. So, Deputy Clerk

Plaintiff & Plaintiff In Pro Per

9 **SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES**

10 **STANELY MOSK COURTHOUSE**

11 DR. STEWART LUCAS MURREY, an
12 individual;

13 Plaintiff,

14 Vs.

15 Kelly Gibbons a.k.a. Kel Culb Gib, an
16 individual; Liv Burger, an individual; Elly
17 Shariat, an individual; Ainka Wiz, an individual;
18 Anonymous Group Member 1, an individual;
19 Amy Blalock, an individual; Vanessa Valdes, an
individual; Lena Vanderford, an individual;
20 Michal Ofek, an individual; Kelyn Rodriguez, an
individual; and DOES 1 through 50, inclusive;

21 Defendants

} Case No. 23STCV14890

} **NOTICE OF MOTION AND MOTION FOR
ORDER AUTHORIZING LIMITED THIRD-
PARTY DISCOVERY NECESSARY TO
IDENTIFY DEFENDANTS;
DECLARATION OF DR. MURREY;
[PROPOSED] ORDER**

} Date: 8 July 2024

} Time: 10:00 a.m.

} Dept.: 61

} Resv. ID: 839705672747

} Complaint Filed: 27 June 2023

} Hon. Lynne M. Hobbs

23 **TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:**

24 PLEASE TAKE NOTICE that on 8 July at 10:00 a.m. in Department 61 of the above-entitled court,
25 located at 111 N. Hill St. in Los Angeles, California 90012, plaintiff Dr. Stewart Lucas Murrey will
26 move the Court for an order authorizing limited third-party discovery necessary to identify
27 defendants in this action. Although multiple defendants have already been identified and served,
28

99

Kel's Post

X



Lena Vanderford
Kel Culb Gib FOUND HIM



Like Reply 35w

19



Katherine Frame
Lena Vanderford Jesus Christ.

Can you post this as it's own comment instead of a reply so more people see it?

Like 35w

5



Brittany Shea

Lena Vanderford What was the ex wife's name?

Like Reply 35w



Kel Culb Gib Author

Brittany I have looked over the court docs and from what I gather, her name was Sherrie M. I'm not sure if I'm able to post her full last name- I don't want to go against group rules. If someone can confirm it's allowed I will comment but it's also listed in some of the reports that have been posted.

Like Reply 35w

2



97



Los Angeles

Kel Culb Gib · Aug 3 · [...](#)

we realized we met before an

8w Like Reply



Jamie Onuki

To Lucas Murray
Lucas Murray
Author of *Heisenberg's Dilemma: Power and Violence: The Meaning of Farm*
[View profile](#)

New books, projects and court reporting services

Dear Jamie,
nice seeing you, I may in fact have a job for you too. I'm into some writing and art projects supported by serious people. How about I tell you more with a phone call or facetime sometime, unless you prefer just to meet 4241 278-3021.

Dr. Lucas Murray
Ph.D. Yale University
Author of *Heisenberg's Dilemma: Power and Violence: The Meaning of Farm*
[View profile](#)

8w Like Reply



Jamie Onuki

Okay her name was Sher

The Prudential Insurance America v. Dr. Stewart Luk

Liv Burger

Group member if you search his name in the group you'll see the thread with my whole story. One of his go-to places was a boutique hotel in Beverly Hills which is also listed by name in the thread, I just can't remember it now.

11h Like Reply



Liv Burger

<https://www.facebook.com/groups/3205948139691054/permalink/3322455148040352/>

11h Like Reply



Liv Burger

Mosaic

[Rules](#)



Are We Dating The Same Guy? |

Los Angeles

Group member · 14h · [...](#)



Are We Dating The Same Guy? |

Los Angeles

Group member · 14h · [...](#)



Liv Burger

Group member barf. He's sooo lazy or maybe he has some kind of system worked out in that place with someone he knows there. Concerning.

11h Like Reply



Are We Dating The Same Guy? |

Los Angeles

Group member · 14h · [...](#)



Liv Burger

Mosaic

11h Like Reply



Liv Burger

Caitlin Brown omg yes! Eww what a creep clearly that's his go to spot.

95

EXHIBIT 17

94

EXHIBIT 16

92

EXHIBIT 15

99

Los Angeles

• Kel Culb Gib • 5d • 5



Michal Ofek

Yes but couldn't find a group
called "don't date"

4d Like Reply



Kel Culb Gib

Author • 5d • ...

Michal Same!

4d Like Reply



Nicole Burova

Same

4d Like Reply



Lena Vanderford

Michal Ofek there are 2 "don't
date" and "don't date LA" but I
feel like I haven't seen posts in a
long time.

3d Like Reply



Michal Ofek

Lena Vanderford thanks

3d Like Reply



Write a reply





Kel Culb Gib

Author Open to messaging

Kera H BJORNERUD we wouldn't have to mention the group at ALLLLL. Could just say I met a girl and talked about it and she had the same experience and knew someone else with the same experience and snowball from there!

1d Like Reply



Kel Culb Gib

Author Open to messaging

Kera H BJORNERUD or even just say I googled him when my gut told me to cancel because his lawsuits are ALLLLLLL public record and he uses his real name 

1d Like Reply

1 



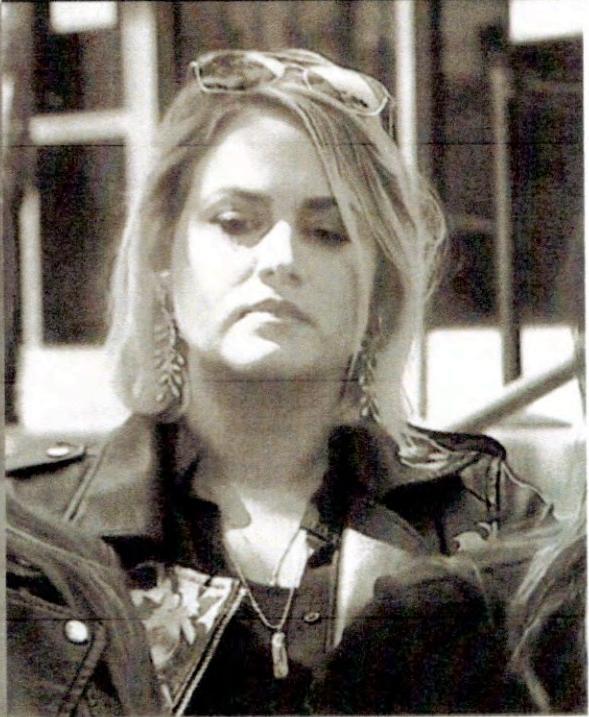
Kel Culb Gib

Author Open to messaging

Eve Salazar he pressed lawsuits against a number of women to extort money from them and was suspected in the murder of his ex wife. I think the doc could investigate the murder since he clearly didn't go to jail about it and instead of accuse him just plant seeds of speculation.

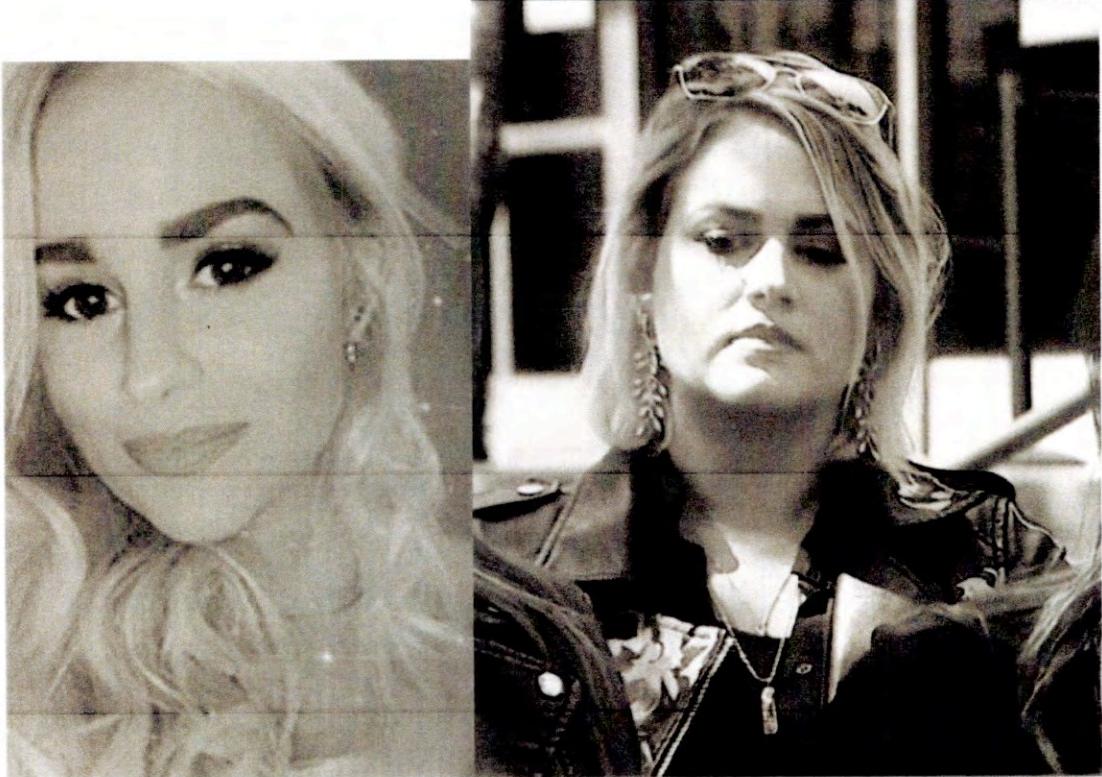
1d Like Reply

1 😱





80



78

[liv burger](#)

All Posts People Reels Groups Pages



Are We Slandered By the Same Girl?

Orange County -Huntington Beach -

Irvine · Follow

Here they are Amir trying to gossip mill and keep you out of the dating pool.

"I didn't get good vibes"
Sounds like a high school locker room!

Gee, IDK Liv Burger, maybe people change? We didn't get good vibes from your comments either.

[Are We Datin...](#)

comments



Anonymous member

Has anyone matched with this guy?
He says his name is Amir from LA



Lisa Todd

Matched when I lived in LA so maybe like 2014. (Same picture btw) I never met him but he got super aggressive and pushy about meeting. I ended up blocking him

55m · Like · Reply

Anonymous member Lisa Todd than

Sara Kash

He's liked my profile but I never matched with him. Also, he's been posted in the AWDTSG LA group several times.

27m · Like · Reply

Liv Burger

Matched ages ago, 5+ years.
Had the same photo back then.
Didn't get good vibes. Never met.

15m · Like · Reply

Anonymous member Liv Burger than



Liv Burger

Matched ages ago, 5+ years.
Had the same photo back then.
Didn't get good vibes. Never met

Like · Reply



Video



Marketplace



Dating



Notifications



Menu



Liv Burger

He had a partner 10000%.

Something similar happened to me years ago. Was on a layover in different city. Went to eat at a bar across the street from the hotel. Met a guy there and turns out he was staying at the same hotel. After talking for a while at the bar I invited him back to my room and we talked for a few more hours and things were starting to get hot and heavy.

He said he was gunna go grab a condom from his room and then just never came back. I was confused so I took the details he had told me (hometown, company he worked for, name) and quickly found his fb. His cover photo was of his wife and their newborn child. 😳

I've had experiences since that seemed totally explainable on their end only to find out that they're cheating. It's becoming super common unfortunately. Sorry that happened, best to just block and move on!

1y Like Reply

22

Anonymous member · Dec 27, 2023 · 2

Top comments ▾



Kcg Gib

My current partner and I are both ASD (tho his presents differently than mine in a lot of ways). It was pretty obvious to me for a few reasons, especially being on the spectrum myself, but for starters - he's incredibly literal and takes things that people say very literally as well. Probably one of the more obvious signs is that he's beyond knowledgeable/informative about his "special interests" which for him include film, tv, marvel, and motorcycles- I'm currently on movie # 22 of 33 Marvel movies because I had never seen them and he immediately insisted we start a marathon (in order 😊). A lot of people on the spectrum have sensory issues; he won't wear socks because of this lol. Sometimes it can seem like he is being rude w his bluntness but he's j... See more

10w Like Reply

13 0 0 0



Allison Eckhart

Kel Culb Gib just here to say I'm so happy for you!! Xox



72

<  Are We Dating The Same Guy? | ...
Los Angeles

Kel Culb Gib · Aug 3 · 



Ainka Wiz

Wow! I also matched with him years ago. Convo ended fast with me blocking him after I googled all the lawsuits against him and being a murder suspect. I also went down the rabbit hole of reading online chats and blogs about him... and several exes have accused him of stds. 🙄 Sorry for the women who actually wasted their time on a date w him. Hopefully no one went back to his place. Luckily we all feel his creepiness pretty quickly. Even in the event that he is innocent in all his cases (which I don't believe it), just the fact that he attracts all this drama is enough. 🤦×



6h Like Reply

2 



Da Alaa

Ainka Wiz how did you find all that... what info and website did you use? Phone number, last name... etc?

5h Like Reply



Ainka Wiz



70

Group member's Post

X



Liv Burger

Group member god how funny would it be if we gathered all of the women he has tried to bamboozle at the same place and time as your date. Just sitting, chatting, scattered around innocently. He would never go back again. 🤪

Like Reply 17w

5



Group member Author

Liv Burger I'm so down for this. Then we can all write a book about it and dedicate it to him 😂😂
Some of us can dress like CIA agents and get him spooked out.. or wear shirts with picture of his ex who was killed.

Like Reply 17w



Group member Author

Liv Burger we can name the book "the deadliest swipe"

Like Reply 17w



Liv Burger



Group member Author

Liv Burger yep that's what he said

Like Reply 21w



Group member Author

Liv Burger seriously something is so weird about all of this. I feel like we should go undercover and get him to confess his crimes! I bet he has some serious skeletons in his closet ..
I feel like this is a movie and I haven't blocked him yet so he's still in the rafters waiting for me to meet him at his creep spots. I wonder what the workers know/think ? There's a reason he goes to the same spots
...

EXHIBIT 12

Kel Culb Gib Author

UPDATE: REPORTED AND REMOVED FROM HINGE.

But he is obviously a predator so keep in mind he could make new profiles with new names or false info if his ego is damaged enough from being removed (he is an overt narcissist so caution is necessary!)

I don't have Bumble or Tinder so I'm not sure how to report him from there, if you've matched with him on either place I encourage you to try to have him removed from those as well.

STAY SAFE LADIESSSS!!

Notification from Hinge



Like Reply 32w

↪ 1 Reply

Write a comment...



last week I've hardly heard from him. I'll message him



Like Reply 9w



Kel Culb Gib Author

Vanessa this guy is unbelievable !

Like Reply 9w



Vanessa Valdes

Kel So unbelievable. Thank you for sharing! I just joined this group and it's already been so helpful. I'm so glad we're protecting each other 🌟

Like Reply 9w



Vanessa Valdes



Like Reply 9w



Vanessa Valdes



62

The screenshot shows the Wikipedia page for "Dateline NBC". The title is "Dateline NBC" with a large red "D". Below it is the subtitle "(also known as *Dateline*)". The page content discusses the American television news magazine, mentioning its broadcast on NBC and its focus on general interest news. It notes that the program airs on Fridays at 10:00 p.m. Eastern Time, with occasional editions at 7 and 8:00 p.m. It also mentions two-hour editions at 9 or 10:00 p.m. and sometimes air on any given scheduled night. The page concludes with a note about the program's cancellation in February 2021.

WIKIPEDIA
The Free Encyclopedia

Dateline NBC

(also known simply as **Dateline**) is a weekly American television news magazine/reality legal show that is broadcast on NBC. It was previously the network's flagship general interest news magazine, but now focuses mainly on true crime stories only occasional editions that focus on other topics. The program airs ~~Fridays at 10:00 p.m. Eastern Time~~ (9:00 p.m. Eastern for special two-hour editions). Special weekend editions also air at 9 or 10:00 p.m. (two-hour editions at 7 and 8:00 p.m. depending on night). One or two-hour feature-length editions sometimes air on any given scheduled evening, often to fill vacancies in the prime-time schedule on the program's respective network due to program cancellations. In February 2021, the program aired its first ever docuseries "The Widower", a five-hour true crime saga about a man who married six women, four of whom died.

For the Australian television current affairs program, see *Dateline (Australian Television)*.

Article

hide

From Wikipedia, the free encyclopedia

[Like](#) [Reply](#)

Kel Culb Gib

Naomi omg ... suing a company that catches cheaters and the suspicion of murdering his wife?! Dateline vibes.

[Like](#) [Reply](#)

Kel Culb Gib

SeAirra Dittenber

[Like](#) [Reply](#)



Crisna Kay

Someone tag me when op posts deets. This is insane

[Like](#) [Reply](#)

↪ View 1 more reply



Kel Culb Gib

Crisna I'm heading home from the studio right now to pour my tea but it



Kel Culb Gib

Author Open to messaging

Eve Salazar he pressed lawsuits against a number of women to extort money from them and was suspected in the murder of his ex wife. I think the doc could investigate the murder since he clearly didn't go to jail about it and instead of accuse him just plant seeds of speculation.

1d Like Reply

1 😱

EXHIBIT 11

54

Lucas Munoz

Kelly Gibbons



I'm not sure why your demeanor has changed so drastically so quickly. You're not into games and I'm not into disrespect. So it's good we didn't meet up 😊

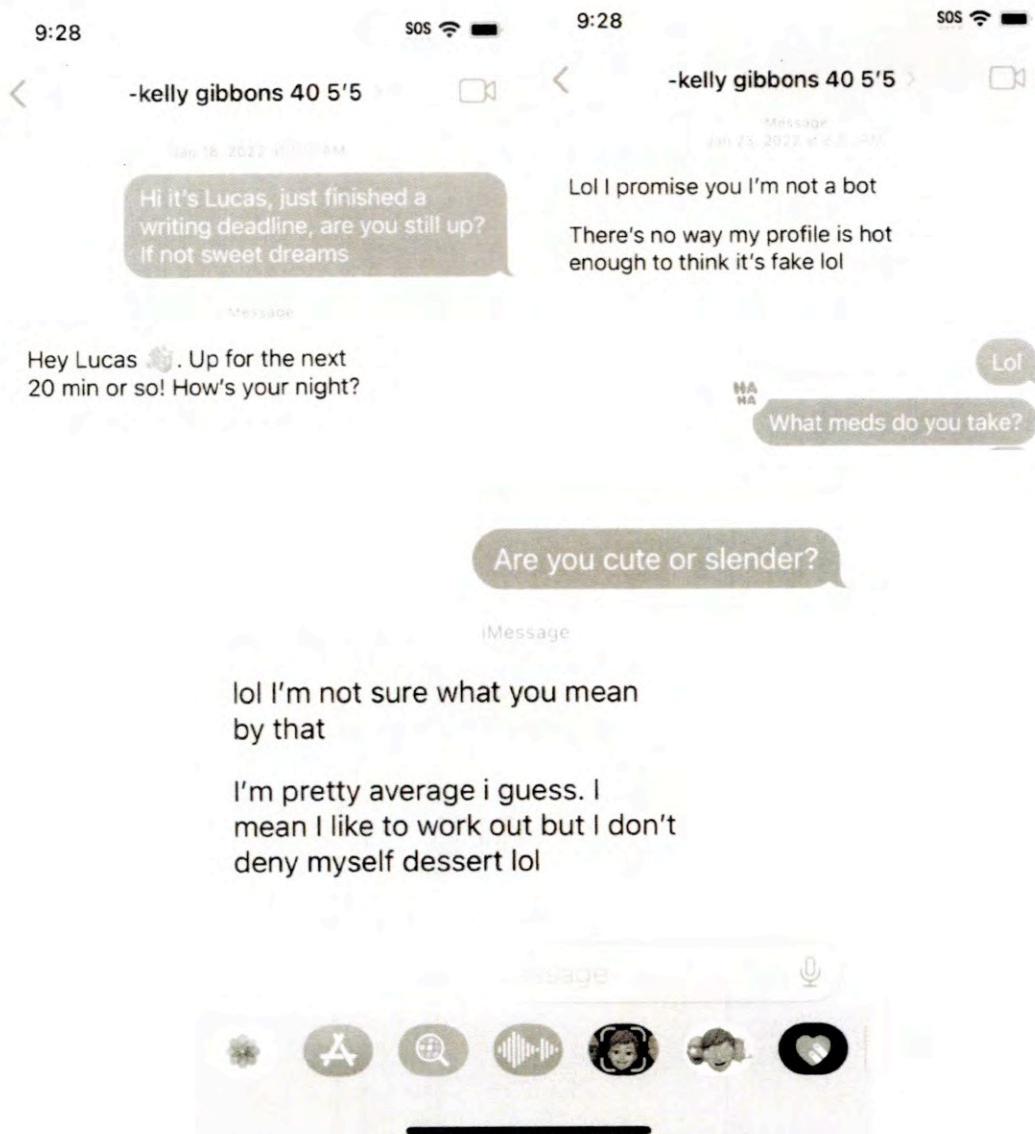
Delivered

I don't know why you have such violent mood swings but if you don't stop texting me I'll just block you lol

Feel free. This is the one of the strangest interactions I've ever had. You went full Jekyll/Hyde within like one minute after making plans. Lol

Sent as Text Message

Exh. 10: A less than two (2) week intermittent text exchange between petitioner and Gibbons in January 2022 – the only time they ever interacted with one another. Petitioner has never met Gibbons in person. After petitioner rightly suspected Gibbons was a “catfish” he rejected her and moved on peacefully with his life.



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SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES
Civil Division
West District, Santa Monica Courthouse, Department P

19SMCV00935
DR. STEWART LUCAS MURREY vs
CHEATERREPORT.COM, et al.

March 22, 2022
8:30 AM

Judge: Honorable Elaine W. Mandel CSR: None
Judicial Assistant: E. Sam ERM: None
Courtroom Assistant: R. Juarez / V. Yonker Deputy Sheriff: None

Motion for Orders Authorizing Third Party Discovery (UNOPPOSED)

Under the Cable Communications Privacy Act, an internet service provider may only disclose customer identifying information with the consent of a customer or pursuant to a court order. 47 U.S.C. § 551. Additionally, to conduct third party discovery unmasking the identity of an anonymous speaker for purposes of a libel case, plaintiff must first make reasonable efforts to notify defendant of the attempt to lift the shield of anonymity and must make a prima facie case supporting a finding of defamation. Glassdoor, Inc. v. Superior Court (2017) 9 Cal.App.5th 623, 634.

Plaintiff requests leave to conduct discovery on third parties including Amazon and Domingo Juan Rivera to obtain IP addresses and information identifying the unknown authors of the alleged defamatory statements. Plaintiff provides evidence that he has been unable to identify the author of the posts. Murrey declaration 18-20. Additionally, plaintiff provides evidence that false statements were made about him on Cheterreport.com, causing him to lose economic opportunities and be wrongfully arrested. Murrey declaration 4-16, exhibit A. This is sufficient to establish a prima facie case for defamation. Under Glassdoor, plaintiff may pursue third-party discovery to uncover the identity of anonymous potential defendants. GRANTED.

DUE TO THE ONGOING COVID-19 PANDEMIC PARTIES AND COUNSEL ARE
ENCOURAGED TO APPEAR BY MICROSOFT OFFICE TEAMS.

*****END OF FINAL RULING*****

48



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COOKIES



NEW CHOCOLATE CHIP
COOKIES

46

EXHIBIT 9

44

ATTACHMENT 7b – Previous Harassment

ATTACHMENT 7b – Previous Harassment

Description of previous incidents of harassment

Background

Petitioner was defamed online in 2015 and 2016 and he sought legal action by filing a case on 24 May 2019 (Exhibit 9, attached to this document). Then in early 2022 (January 2022) petitioner matched with respondent Gibbons on a dating app and they exchanged only intermittent texts for approximately two (2) weeks. (Exhibit 10, attached to this document). During this time petitioner rightly suspect of Gibbons being a “catfish” i.e. using edited, filtered pictures that do not resemble her in real life and he then quickly rejected her (Exhibit 10, attached to this document). Thereafter petitioner never gave Gibbons a second thought and he peacefully moved on with his life. As the following shows, Gibbons failed to move on with her life and instead initiated a secret online conspiracy to severely gang-stalk and cyberbully petitioner with other co-conspirators such as Vanessa Valdes for years on various online platforms, including, but not limited to Facebook forums (see relevant restraining order case no. 24STRO03710, Dr. Murrey v. Valdes) – and for which Gibbons is currently being sued (See LASC case no. 23STCV14890, Dr. Murrey v. Gibbons).

Gibbons' Sick And Secret Obsession With Petitioner And Harming His Life

Years later in 2023 I began to obtain evidence that Gibbons, Valdes et al. had been obsessively and secretly posting about me in countless online platforms, including, but not limited to Facebook forums with millions of users (Exhibit 11, attached to this document). Shocked because I had forgotten all about Gibbons, I then saw evidence that Gibbons, Valdes et al. had participated aggressively in a conspiracy to ruin my life. Alongside posts falsely accusing petitioner of “MURDER”¹, “extortion”, “domestic violence”, having “STDs”, having a fraudulent Ph.D from Yale University, etc. (Exhibit 12, attached to this document), Gibbons, Valdes et al. aggressively made their own contributions to harm petitioner and his reputation, as noted above (Exhibit 11, attached to this document). In particular, Gibbons’ conspiracy to harm petitioner is directly linked to Valdes and others such as Liv Burger, Blalock and a host of anonymous Facebook accounts. Together Gibbons, Valdes, Burger, et al. gang-stalked, cyberbullied and harmed petitioner for years in secret in the above-noted online Facebook forums (Exhibit 12, attached to this document).

Dangerous Mental Disorders of Gibbons, Valdes, Burger et al.

What is even more troubling is that these women have themselves admitted to having psychological disorders and weight issues (Exhibit 13, attached to this document). But Facebook is not liable for the harm Gibbons, Valdes, Burger et al. cause. This is itself an issue because Facebook profits from attracting such psychos who, in turn, create web-traffic while they ceaselessly commit their online crimes. And petitioner has no relationship with any of these women whatsoever; he never did, nor does he ever want one. Thus it is absurd for psychopaths

¹ Presumably this is in reference to my girlfriend who passed from cancer in 2018 and for whom I deeply cared and loved.



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THE  TIMES

THURSDAY APRIL 11 2024

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Vanessa Valdes and Olivia Berger are among the defendants in the defamation and privacy case brought by Stewart Lucas Murrey

40

7:29

5G

LAW & CRIME

Defendants actually harassed them on dating apps, defendants say

MARISA SARNOFF | Mar 24th, 2024, 9:43 am

8 comments

SHARE



Olivia Berger, left, and Vanessa Valdes,

EXHIBIT 8

36

EXHIBIT 7

34

EXHIBIT 6

32

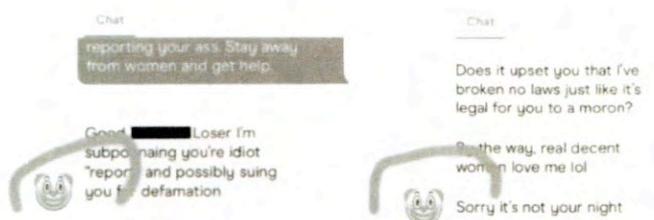
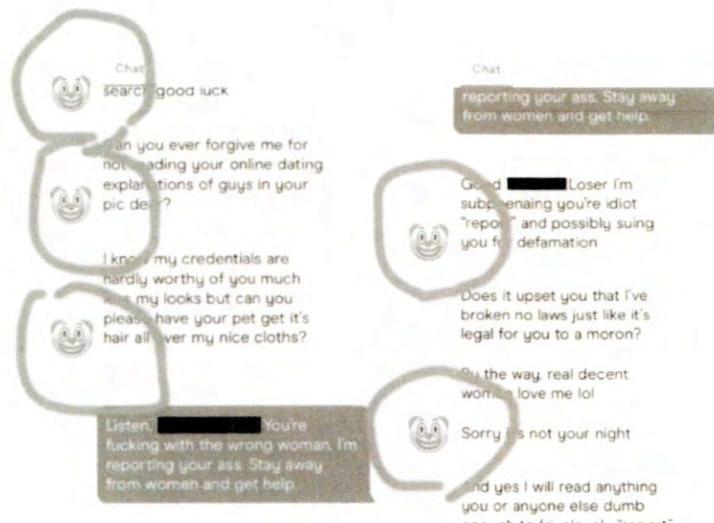
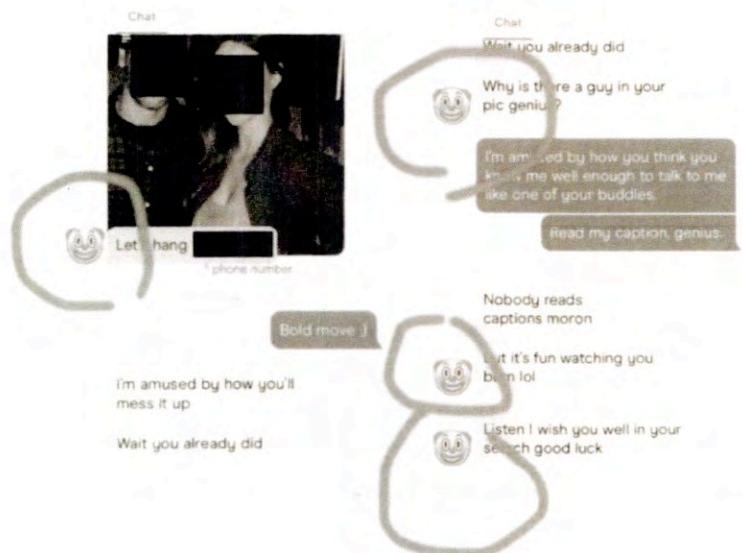


EXHIBIT 5

28

professional conduct are defamatory per se.” (Burrill v. Nair (2013) 217 Cal.App.4th 357, 383 [158 Cal.Rptr.3d 332, 351] disapproved on other grounds in Baral v. Schnitt (2016) 1 Cal.5th 376.) Plaintiff has presented a statement by Blalock that are reasonably interpreted as charging the commission of a crime: “if there’s any missing women in LA – he has something to do with it.” (Murrey Decl. Exh. 12.) Plaintiff testifies that this statement is false, as he has “never murdered anyone.” (Murrey Decl. ¶ 14.)

Accordingly, the motion is DENIED as to the first, second, and fourth causes of action for defamation and false light.

Plaintiff has not, however, presented any evidence to support his remaining claims against Blalock. There is no invasion of privacy claim against Blalock, as Plaintiff presents no evidence that any alleged date with Blalock — the one detail she disclosed — constituted a “private fact.” (Morrow v. Los Angeles Unified School Dist. (2007) 149 Cal.App.4th 1424.) And although Blalock claimed in her Facebook post that she attempted to secretly record Plaintiff on this date, Plaintiff himself denies that this date ever occurred. (Opposition at pp. 9–10.)

Nor is there a factual basis for a claim of intentional infliction of emotional distress against Blalock. “The elements of a prima facie case for the tort of intentional infliction of emotional distress are: (1) extreme and outrageous conduct by the defendant with the intention of causing, or reckless disregard of the probability of causing, emotional distress; (2) the plaintiff’s suffering severe or extreme emotional distress; and (3) actual and proximate causation of the emotional distress by the defendant’s outrageous conduct.” (Miller v. Fortune Commercial Corporation (2017) 15 Cal.App.5th 214, 228–29.) Here, Plaintiff does not present any evidence or testimony concerning the emotional distress he claims to have suffered as a result of Blalock’s posts. (See Wong v. Jing (2010) 189 Cal.App.4th 1354, 1376 [“Severe emotional distress means emotional distress of such substantial quality or enduring quality that no reasonable [person] in civilized society should be expected to endure it.”], internal quotation marks omitted.)

The cause of action for sex-based discrimination under Civil Code § 51, concerns Defendants’ alleged failure to permit Plaintiff to join their Facebook group to challenge their alleged defamatory statements. (FAC ¶¶ 57–68.) But even if a

After a defendant meets their burden of showing that the gravamen of the complaint involves protected activity, the plaintiff must then “demonstrate that the complaint is both legally sufficient and supported by a sufficient prima facie showing of facts to sustain a favorable judgment if the evidence submitted by the plaintiff is credited.” (Matson v. Dvorak (1995) 40 Cal.App.4th 539, 548.) A defendant can meet its burden if it can establish that the plaintiff cannot overcome an affirmative defense. (Birkner v. Lam (2007) 156 Cal.App.4th 275 at 285.)

“[A] plaintiff cannot simply rely on his or her pleadings, even if verified. Rather, the plaintiff must adduce competent, admissible evidence.” (Grenier v. Taylor (2015) 234 Cal.App.4th 471, 480.)

“Legally sufficient” means that the cause of action would satisfy a demurrer. (Dowling v. Zimmerman (2001) 85 Cal.App.4th 1400, 1421.) The evidentiary showing must be made by competent and admissible evidence. (Morrow v. Los Angeles Unified School District (2007) 149 Cal.App.4th 1424, 1444.) Proof, however, cannot be made by declaration based on information and belief. (Evans v. Unkow (1995) 38 Cal.App.4th 1490, 1497–1498.) The question is whether the plaintiff has presented evidence in opposition to the defendant’s motion that, if believed by the trier of fact, is sufficient to support a judgment in the plaintiff’s favor. (Zamos v. Stroud (2004) 32 Cal.4th 958, 965.)

1. Ofek
- 2.

Here, Plaintiff does not attempt to argue for the legal or factual sufficiency of any claims against Ofek, save for the sixth cause of action for invasion of privacy, the eighth cause of action for intentional infliction of emotional distress, and the tenth cause of action for civil conspiracy. (Opposition at pp. 7–13.) As no effort has been made to establish the legal and factual sufficiency of Plaintiff’s other claims against Ofek, the motion is properly GRANTED as the outset to all causes of action other than the sixth, eighth, and tenth causes of action.

As to the remaining claims, Plaintiff argues that Ofek has stalked him within the meaning of Penal Code § 646.9, which applies criminal penalties against “[a]ny person who willfully, maliciously, and repeatedly follows or willfully and maliciously harasses another person and who makes a credible threat with the intent

(Murrey Decl. Exh. 14.)

As to Defendant Ofek, Plaintiff presents one comment Ofek made in response to another post inquiring whether anyone was interest in “figuring out a mini-doc vibe about that Lucas fellow” with the reply, “you’re hilarious, I love you boo.” (Murrey Decl. Exh. 10.)

Plaintiff cites another statement by Ofek, in response to a picture listing a number of allegations against Plaintiff, asking “what’s the name of this group” in which the allegations were posted, and stating that she “couldn’t find the group” named by another commenter. (Murrey Decl. Exh. 10.)

Plaintiff cites another post where Ofek responded to a comment that asked, “is it defamation if it’s true???” with the statement, “truth is a viable defense [smile emoji].” (Murrey Decl. Exh. 10.)

Plaintiff states that he recalls Ofek with another defendant attempting to film him one evening in May 2023. (Murrey Decl. ¶ 35.)

The allegations of wrongdoing against Ofek and Blalock are similar in character to the allegations made against Defendant Vanessa Valdes, which were the subject of a prior anti-SLAPP motion granted by this court on April 8, 2024. The analysis of that ruling is applicable to both Blalock and Ofek here.

From the above, there is ample basis to conclude that Plaintiff’s suit against Valdes arises from protected activity, both through statements made in a public forum concerning an issue of public interest and through conduct in furtherance of the exercise of the constitutional right of free speech in connection with a public issue or an issue of public interest. Valdes’s statements were made in an online Facebook group to what Plaintiff’s FAC characterizes as an audience of “millions.” (FAC ¶ 10.) Similar online postings have been held to involve a “classic public forum.” (Chaker v. Mateo (2012) 209 Cal.App.4th 1138, 1146.)

Plaintiff’s objection that he was not permitted to join the group in question does not obviate the character of public forum. (Opposition at pp. 10–11.) Smaller scale, closed publications have been held to amount to public fora. Statements made in a newsletter of limited circulation to a

The anti-SLAPP statute defines protected activities as:

(1) any written or oral statement or writing made before a legislative, executive, or judicial proceeding, or any other official proceeding authorized by law, (2) any written or oral statement or writing made in connection with an issue under consideration or review by a legislative, executive, or judicial body, or any other official proceeding authorized by law, (3) any written or oral statement or writing made in a place open to the public or a public forum in connection with an issue of public interest, or (4) any other conduct in furtherance of the exercise of the constitutional right of petition or the constitutional right of free speech in connection with a public issue or an issue of public interest.

(Code Civ. Proc., § 425.16, subd. (e), emphasis added.)

Defendants Amy Blalock and Michal Ofek argue that the claims alleged against them arise from protected activity, namely “written or oral statement[s] or writing[s] made in a place open to the public or a public forum in connection with an issue of public interest,” as well as “any other conduct in furtherance of the exercise of the constitutional right of free speech in connection with a public issue or an issue of public interest.” (Motion at p. 4.) Defendants base this contention on the nature of the conduct alleged against them, which consists of posts made in a Facebook group called “Are We Dating the Same Guy – Los Angeles,” evidently a Facebook group in which users post or inquire with other users about men whom they have dated or are looking into dating. (Motion at p. 2; FAC ¶ 4.)

Plaintiff alleges the following misconduct collectively against Valdes and other defendants:

Defendants wrote, published, and circulated defamatory statements about plaintiff to millions of users on Facebook . . . that include the following states: “Public records show” [that plaintiff has] involvement in [a] MURDER case of his ex wife,” is “suspected of murder”; [h]as several domestic violence charges filed against him”; has “filed court cases against women trying to extort money from them”; “[h]as acted aggressively in court”; “has STDs”; has an “ex-wife who was killed”; deserves to be “ARRESTED”; “claim[s] he is an attorney”; and that plaintiff is listed on the California court’s public record as being a vexatious litigant.”

(FAC ¶ 8.)

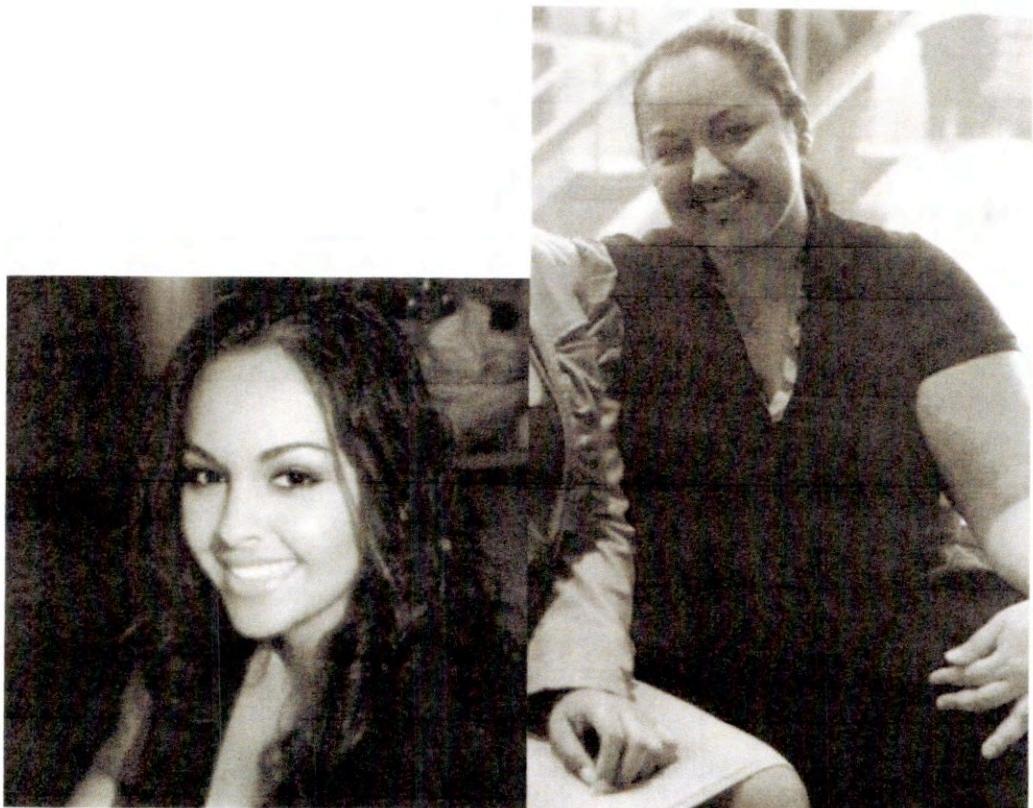
It is unclear from the pleading which of the above statements Plaintiff attributes to which defendant. In opposition to the present motions, Plaintiff presents the

denies that she was present at the location at the time served, and presents a photo with geolocation data taken on her phone at a location near Monrovia at 6:10 p.m. (Motion Exh. B.)

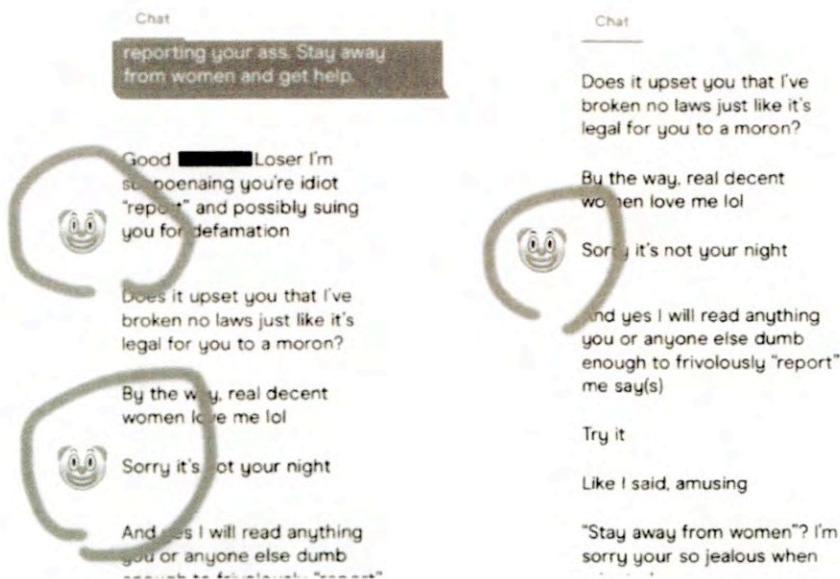
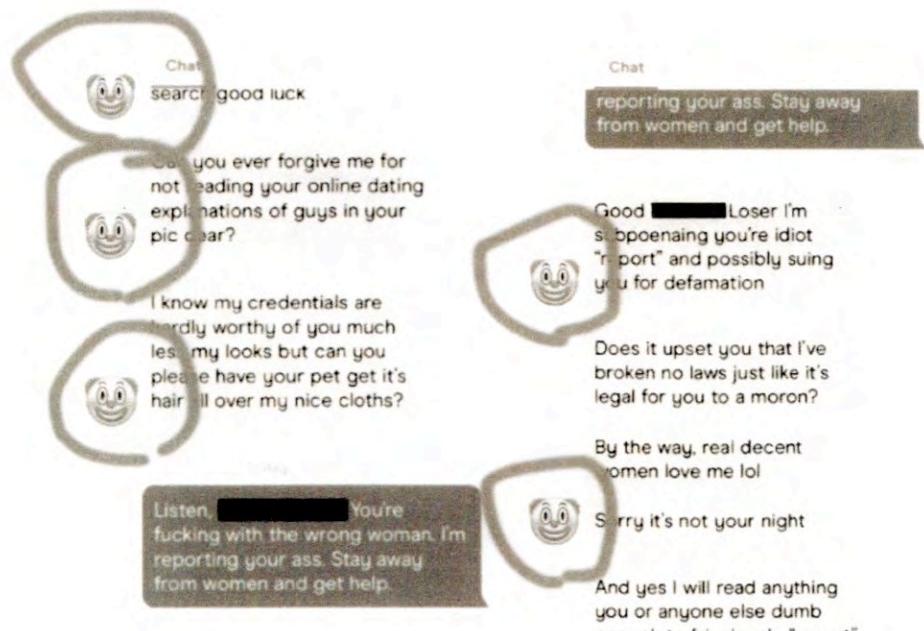
Plaintiff Stewart Lucas Murrey (Plaintiff) argues that Shariat was served by a registered process server as indicated in the proof of service, and that the evidence Shariat presents in her motion is unauthenticated by any declaration. (Opposition at pp. 4–7.) Plaintiff presents his own declaration, stating that he “professionally obtained” the address in question. (Murrey Decl. ¶ 16.) Plaintiff also presents the declaration of the process server, Daniel Rolfe, who states he thrice attempted service at the address in question: once on December 18, 2023, when Shariat answered the door and “fraudulently acted as if she was someone else to elude service” (Rolf Decl. ¶ 6); once on December 20, 2023, when no one answered the door but Rolfe could hear the floor creaking and saw the window was open (Rolle Decl. ¶ 8); and finally on December 22, 2023, when Rolfe spoke to the same woman he saw before, who refused to show her ID, at which point he “drop served” her. (Rolle Decl. ¶ 9.)

Shariat in reply belatedly presents a declaration stating that at the time of alleged service, she was 100 miles away at her partner’s home, as indicated by the geolocation data accompanying the phone-image presented in her motion. (Shariat Decl. ¶ 4.) Shariat states that, in response to Plaintiff’s opposition, she travelled to Palm Springs on May 18, 2024, and attempted to contact the resident of the appropriate unit without success. (Shariat Decl. ¶ 5.) She does, however, present the declaration of Bryce Hansen, the resident of the unit across from the unit served, who states that Shariat is not the occupant of the unit in question, and that he had never met Shariat until she contacted him on May 18, 2024. (Shariat Decl. ¶ 5, Exh. C.)

The evidence presented by both parties uniformly supports the proposition that Shariat was not served. The sole evidence that Plaintiff presents for the proposition that Shariat resides at the unit in question is that portion of his declaration stating that he “professionally obtained” her address, without elaboration. (Murrey Decl. ¶ 16.) The process server states that he served the papers upon the address, apparently in accordance with Plaintiff’s instructions. (Rolle Decl. ¶ 5.) The resident of the unit denied that they were Shariat, and Plaintiff presents no evidence to suggest otherwise. The process server does not claim that the person served matched the photos that Plaintiff provided him. (Rolle Decl. ¶ 7.) Shariat instead presents evidence that she was some hundred miles away from the unit in question on the



16



Matched with him on Tinder a few years back. He wanted to meet up IMMEDIATELY but I made it clear I couldn't because I had a client in town, also let him know my texts/replies wouldn't be timely because I'd be with my client and didn't want to be rude. He found my Instagram and even though I hadn't geo-tagged where in Beverly Hills I was, I guess he recognized the pool and at some point in the evening stopped by the hotel and sat down next to me and my client at the bar exclaiming "I've been looking for you all over town! You're a hard girl to pin down!" I was flabbergasted

a hard girl to pin down!" I was flabbergasted and freaking out because who tf does that?! To show up uninvited at a place I didn't tell you about? Luckily a British guy a few seats over heard everything and pretended like he knew me and my client, apologized for having a call that ran long, and said why don't w... See more

10w Wow Reply

10 🎉🎉

Exh. 3: Gibbons' Fraudulent and Harassing GoFundMe webpage whereon Gibbons and Valdes posts defendant Elly Shariat's fictional story of stalking to harm petitioner. It appears on pages two and three below and begins with: "Matched with him on Tinder a few years back."





Paige Cone



Like Reply



2

The comment from **Kel Culb Gib** is replying to has been deleted.

Like Reply

Kel Culb Gib Author
Vanessa Valdes

Paige We believe you, hon! I'm so sorry that happened ☁

Like Reply 1d

Like Reply 9w



Kel Culb Gib Author

Vanessa Valdes this guy is unbelievable !

Like Reply 9w



Vanessa Valdes

Kel So unbelievable. Thank you for sharing! I just joined this group and it's already been so helpful. I'm so glad we're protecting each other

Like Reply 9w



Vanessa Valdes

12.15

Like Reply 9w



Kel Culb Gib Author

Lena zero followers lol



2



Lauren-Ashleigh Christian

Lena Vanderford is that a cash tag in his bio?? Lmao ☀

Like Reply 2w

The comment from **Vanessa Valdes** is replying to has been deleted.



Vanessa Valdes

12.15

December 28, 2019

12:15 PM

Like Reply 2w

Vanessa Valdes

12.15

December 28, 2019

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EXHIBIT 2

EXHIBIT 1

4

ATTACHMENT 7a(3) – Describe Harassment

Respondent Kelly Gibbons (and her co-conspirators) has created a GoFundMe webpage whereon Gibbons publishes false stories alleging that petitioner stalked and harassed someone named Elly Shariat (Exhibit 3, attached to this document). Shariat's story is pure fiction. Petitioner has never met this person in his life and he has no idea who Shariat is. Worse for Valdes, Shariat is currently being sued alongside Gibbons and their co-conspirators in the above-noted currently pending LASC case no. 23STCV14890. Still worse for Gibbons, Valdes, et al., Shariat knows that she is guilty, she is desperately running from service of the summons of said lawsuit and like Gibbons and Valdes, Shariat is a "catfish" who looks nothing like the filtered pictures of herself that she posts online and she and other defendants such as Gibbons, Blalock et al. are being properly located, identified and sued (Exhibit 4, attached to this document). Gibbons et al. have been on notice that Shariat's story is false and severe defamation long before Gibbons published it and Gibbons' publication of Shariat's defamatory story on her GoFundMe webpage remains online still today (Exhibit 3, attached to this document). In this context of severe harassment and defamation Gibbons and Valdes further harm petitioner by "**doxing**" his private text messages with degrading **clown symbols** alongside each screenshot (Exhibit 5 and 3, attached to this document). As shown in the Attachment 7b: "Previous Harassment" Gibbons, Valdes et al. had already "**doxed**" petitioner's private telephone numbers years ago. Thus Gibbons and Valdes blocking out his number now is just Gibbons and Valdes trying to deceive the court. In truth *Gibbons and Valdes posted petitioner's private text messages on their hate-fueled GoFundMe webpage that has since been frozen because petitioner has placed GoFundMe on notice of Gibbons and Valdes' criminal attack.* As shown below Gibbons also published petitioner's full name on hate websites which is another direct act of **doxing** and invasion of privacy. **Doxing** (sometimes written as **Doxxing**) is the act of revealing identifying information about someone online, such as their real name, home address, workplace, phone, financial, and other personal information. Information is then circulated to the public without the victim's permission. Under penal code 653.2, *doxxing* is the act of releasing personal identifying information about another person with the intent of causing that person unwanted injury or harassment. As noted above, to increase the harm of Gibbons and Valdes' **doxing** of petitioner's private texts Gibbons and Valdes add harassing **clown symbols** on each of them (Exhibits 5 and 3, attached to this document). As will be clear below, Gibbons and Valdes did this because they wanted petitioner to be **doxed** and harmed further by Gibbons and Valdes' fraudulent Facebook account harassing and impersonating petitioner: "Stewart Lucas Murrey **Clown**" account (Exhibit 6, attached to this document). Finally, Gibbons and Valdes' GoFundMe webpage have several other harmful statements about petitioner to incite hatred against him and without any support of why Gibbons or Valdes are saying these things. For instance, Gibbons states that petitioner "poses a legitimate danger to the women of Los Angeles" (Exhibit 7, attached to this document) without offering any evidence in support thereof and only with fictional stories that Gibbons and Valdes is aware are false.

But what has made Gibbons' link to death threats against petitioner even more clear is Gibbons' smear campaign about petitioner that she initiated recently on local and international tv new media channels and elsewhere online and with her co-conspirators such as Valdes and Liv Burger (Exhibit 8, attached to this document). Here Gibbons promotes her fraudulent and harassing GoFundMe webpage and all the other harmful and illegal statements noted above to

(15) Possession and Protection of Animals

I ask the court to order the following:

- a. That I be given the sole possession, care, and control of the animals listed below, which I own, possess, lease, keep, or hold, or which reside in my household.

(Identify animals by, e.g., type, breed, name, color, sex.)

I request sole possession of the animals because (*specify good cause for granting order*):

- Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 15a—Possession of Animals" for a title.
-
-

- b. That the person in ② must stay at least _____ yards away from, and not take, sell, transfer, encumber, conceal, molest, attack, strike, threaten, harm, or otherwise dispose of, the animals listed above.

(16) Additional Orders Requested

I ask the court to make the following additional orders (*specify*):

- Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 16—Additional Orders Requested," for a title.
-
-

(17) Number of pages attached to this form, if any: 117

Date: _____

Lawyer's name (if any)

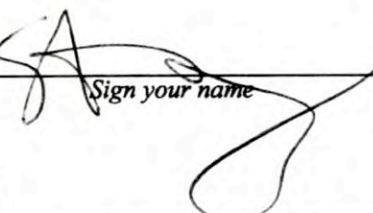
Lawyer's signature

I declare under penalty of perjury under the laws of the State of California that the information above and on all attachments is true and correct.

Date: 11 June 2024

Dr. Stewart Lucas Murrey

Type or print your name

► 
Sign your name

This is not a Court Order.

Check the orders you want. **8 Personal Conduct Orders**

I ask the court to order the person in ② not to do any of the following things to me or to any person to be protected listed in ③:

- a. Harass, intimidate, molest, attack, strike, stalk, threaten, assault (sexually or otherwise), hit, abuse, destroy personal property of, or disturb the peace of the person.
- b. Contact the person, either directly or indirectly, in any way, including, but not limited to, in person, by telephone, in writing, by public or private mail, by interoffice mail, by email, by text message, by fax, or by other electronic means.
- c. Other (specify):
 Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 8c—Other Personal Conduct Orders," for a title.

The person in ② will be ordered not to take any action to get the addresses or locations of any protected person unless the court finds good cause not to make the order.

9 Stay-Away Orders

a. I ask the court to order the person in ② to stay at least 100 yards away from (check all that apply):

- | | |
|---|--|
| (1) <input checked="" type="checkbox"/> Me. | (8) <input checked="" type="checkbox"/> My vehicle. |
| (2) <input type="checkbox"/> The other persons listed in ③. | (9) <input type="checkbox"/> Other (specify):
<hr/> <hr/> |
| (3) <input checked="" type="checkbox"/> My home. | <hr/> <hr/> |
| (4) <input checked="" type="checkbox"/> My job or workplace. | <hr/> <hr/> |
| (5) <input type="checkbox"/> My school. | <hr/> <hr/> |
| (6) <input type="checkbox"/> My children's school. | <hr/> <hr/> |
| (7) <input type="checkbox"/> My children's place of child care. | <hr/> <hr/> |

b. If the court orders the person in ② to stay away from all the places listed above, will he or she still be able to get to his or her home, school, or job? Yes No (If no, explain below):

- Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 9b—Stay-Away Orders," for a title.

10 Firearms (Guns), Firearm Parts, and Ammunition

Does the person in ② own or possess any firearms (guns), firearm parts, or ammunition? This includes firearm receivers and frames, and any item that may be used as or easily turned into a receiver or frame (see Penal Code section 16531). Yes No I don't know

If the judge grants a protective order, the person in ② will be prohibited from owning, possessing, purchasing, receiving, or attempting to purchase or receive firearms (guns), firearm parts, and ammunition while the protective order is in effect. The person in ② will also be ordered to turn in to law enforcement, or sell to or store with a licensed gun dealer, any firearms (guns) and firearm parts within their immediate possession or control.

This is not a Court Order.

4 Relationship of Parties

How do you know the person in (2)? (Explain below):

Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 4—Relationship of Parties" for a title.

Gibbons initiated a match on a datingApp 2022, after 2 weeks texting I rejected her; she since stalked+harassed me

5 Venue

Why are you filing in this county? (Check all that apply):

- a. The person in (2) lives in this county.
- b. I was harassed by the person in (2) in this county.
- c. Other (specify): _____

6 Other Court Cases

a. Have you or any of the persons named in (3) been involved in another court case with the person in (2)?

Yes No (If yes, check each kind of case and indicate where and when each was filed.)

	Kind of Case	Filed in (County/State)	Year Filed	Case Number (if known)
(1)	<input type="checkbox"/> Civil Harassment	Los Angeles, California	2023	23STCV14890
(2)	<input type="checkbox"/> Domestic Violence			
(3)	<input type="checkbox"/> Divorce, Nullity, Legal Separation			
(4)	<input type="checkbox"/> Paternity, Parentage, Child Custody			
(5)	<input type="checkbox"/> Elder or Dependent Adult Abuse			
(6)	<input type="checkbox"/> Eviction			
(7)	<input type="checkbox"/> Guardianship			
(8)	<input type="checkbox"/> Workplace Violence			
(9)	<input type="checkbox"/> Small Claims			
(10)	<input type="checkbox"/> Criminal			
(11)	<input checked="" type="checkbox"/> Other (specify): Defamation, Civil Rights, Etc.			

b. Are there now any protective or restraining orders in effect relating to you or any of the persons in (3) and the person in (2)? No Yes (If yes, attach a copy if you have one.)

7 Description of Harassment

Harassment means violence or threats of violence against you, or a course of conduct that seriously alarmed, annoyed, or harassed you and caused you substantial emotional distress. A course of conduct is more than one act.

a. Tell the court about the last time the person in (2) harassed you.

(1) When did it happen? (provide date or estimated date): late May 2024-present, death threats

(2) Who else was there?

Harassment, gang-stalking and cyberbullying was online from early 2022 until the present. Although it was mostly in secret, petitioner Dr. Murrey has meanwhile obtained evidence of Gibbona's continuous crimes and civil torts as explained and presented herein.

This is not a Court Order.